

Exhibit 11 August 10, 2016 Motion for Interim Fee
Order

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Court-Appointed Receiver

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF HUMBOLDT

CITY OF EUREKA, a municipal
corporation, ("the City") and the PEOPLE
OF THE STATE OF CALIFORNIA, ("the
People") by and through Jones & Mayer,
Special Counsel of the City of Eureka,

Petitioner,

vs.

FLOYD SQUIRES; FLOYD E. SQUIRES;
FLOYD E. SQUIRES III; BETTY J.
SQUIRES; FB SQUIRES FAMILY
TRUST; BETTY J'S BUILDING, INC; and
DOES ONE through SIXTY,

Respondents.

Case No.: DR110040

**PRIOR RECEIVER MARK S. ADAMS
MOTION FOR INTERIM FEE ORDER;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
MARK ADAMS; DECLARATION OF
ANDREW ADAMS; (PROPOSED) ORDER**

Date: September 9, 2016

Time: 1:45 p.m.

Dept.: 8

NOTICE IS HEREBY GIVEN that on September 9, 2016 at 1:45 p.m., or as soon
thereafter as the Court may be able to hear the matter, Mark Adams, the previous Court-
appointed Receiver ("Prior Receiver") in this proceeding, for the 26 receivership properties as
referenced in the March 10, 2011 Appointment Order and the six properties in the October 24,
2011 Appointment Order (collectively, the "Properties"), will appear in Department 8 of the
Humboldt Superior Court, located at 825 Fifth Street, Eureka, CA 95501 to move for an Order
directing Respondents to pay a total of \$223,715.39 in outstanding fees, costs, advances and

1 expenses of the Prior Receiver. The Court previously postponed ordering those fees and costs
2 paid pending the result of the tort suit in *Squires v. Adams* (Case #DR110803), and the jury came
3 back with their verdict in the Prior Receiver's favor on July 22, 2016. So this Court is now free
4 to rule on the request for fees and the repayment of the over five years of costs and advances.

5 This Motion is based on the attached Points and Authorities, the accompanying
6 declarations of Mark Adams and Andrew Adams, as well as the contents of the reports, papers
7 and records filed in this proceeding, and such other oral and documentary evidence and argument
8 as may be presented to the Court at the time of the hearing.

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12 Date: August 10, 2016



Mark S. Adams, former Court-appointed Receiver

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I. INTRODUCTION

This Court previously appointed Mark Adams under Health and Safety Code §17980.7(c) as receiver in 2011. The first appointment was on 26 properties, and the next appointment order limited it to six. Both of those orders were ultimately appealed and stayed. The Prior Receiver then petitioned the Court for an interim fee order, and on January 14, 2014, the Court approved a portion of those fees, and putting off awarding the rest until the tort suit in *Squires v. Adams*, where Floyd and Betty Squires and three tenants alleged various trespasses and emotional distress due to the actions of the Receiver, was resolved.

The tort suit went to trial on July 18, and was completed on July 22 when the jury found absolutely no wrong doing by the Prior Receiver. Thus, California law now directs this Court to order that the receivership and the defense fees are paid, and to order Respondents personally to pay the fees, costs, advances and expenses. In preparation for the fees going unpaid (as the previous award did), the Court should increase the existing priority Receiver's Certificate on the 26 receivership real properties. This Court was cautious before in waiting until the jury trial had completed, but now that the trial has completed and the claims of wrongdoing were rejected, there is no reason not to order those fees, costs, advances and expenses paid.

II. STATEMENT OF FACTS

This Court originally appointed Adams as Receiver on March 10, 2011 for 26 of the Squires' properties. That Order was stayed by the appeal and undertaking filed by Squires, and on October 24, 2011, the Court again appointed Adams for six of the original 26 properties, while at the same time granting a preliminary injunction. That Order was also stayed on appeal after the entry of an undertaking. After the appeal was completed, the Court again appointed a receiver for some of the Properties on September 13, 2013, but Adams declined to be considered for this appointment due to the pending tort suit. The replacement receiver, Jeffrey Smith continues in his role as Receiver to this date.

Previously, Adams requested that this Court award approximately \$65,494 and then \$85,599.23 in fees, costs and advances on February 20, 2012 and June 19, 2013 respectively.

1 The Court declined to grant the total amount requested, and in a September 4, 2012 Tentative
2 Ruling, granted the fees incurred during the two appointments prior to the appeal and the filing
3 of the undertaking, but at the same time denied without prejudice all other fees for review after
4 the trial in *Squires v. Adams* was completed. On January 9, 2014, this Court issued an Order
5 finding that Floyd Squires, Floyd B. Squires III, Betty J. Squires, FB Squires Family Trust, and
6 Betty J's Building, Inc. were jointly and severally liable for the \$15,317 in then-awarded fees
7 and costs. The Order also authorized Adams to issue a super-priority Receiver's Certificate in
8 that amount, which is to be secured by a deed of trust on all 26 properties. This current Motion
9 requests an increase to that Certificate, in addition to an increase to the amount that the order
10 against Respondents personally.

11 Adams requested authority to retain counsel as receiver under Rules of Court, rule 3.1180
12 on June 19, 2014. That Motion was denied by the Court on September 8, 2014. The Court stated
13 that until the questions of *Squires v. Adams* (in particular until the question of whether or not the
14 actions taken by Adams on October 5-6, 2011 were proper) were settled, that all receiver fees
15 and receiver's counsel's fees would not be heard. The Court's directive was that the companion
16 tort suit be settled before the Court would issue any order on the payment of the fees incurred.

17 The Squireses' tort claims went to trial on July 18-22, 2016 in Humboldt Superior Court.
18 The jury returned their verdict on July 22, 2016 and found for Mark and Andrew Adams, and
19 CRG on every cause of action. The Jury found that there was no trespass, no invasion of privacy,
20 and no infliction of emotional distress. Now that the trial has been completed, and those claims
21 adjudicated, this interim fee motion is submitted for the Court and the parties' review. This Court
22 set out the termination and resolution of the tort suit as the appropriate time to award the fees.
23 That is exactly what this Motion requests.

24 25 **III. RECEIVERSHIP FEES, COSTS AND ADVANCES MUST BE PAID**

26 When a receiver is appointed upon real property and directed to take whatever actions is
27 necessary to abate the conditions that required the appointment, the fees and costs of that work
28 must be paid. A receiver is the agent or arm of the Court, but is not paid by the State. Usually the

1 property itself pays the receivership fees and costs, but in situations where that is not possible,
2 the property owner, or the party responsible for whatever led to the appointment is ordered to
3 pay. That is the situation here, as the owners of the Properties have delayed payment while their
4 tort claim went all the way to trial. Now that the trial has wrapped up, and the claims rejected,
5 the owners must pay for those receivership and defense fees and costs.

6 A receiver is an independent third party, a “hand” or “agent” of the court that acts only
7 upon the direction and authority of the appointing court. Rules of Court, rule 3.1179; *Lakeba v*
8 *Superior Court* (1919) 43 Cal.App. 469, 475. And in that role, a receiver is entitled to payment
9 of his own fees and costs, and the fees of all agents in his employ. *City of Chula Vista v*
10 *Gutierrez* (2012) 207 Cal.App.4th 681, 685, citing *Fenza v. Fenza* (1951) 101 Cal.App.2d 678,
11 680; see *City of Santa Monica v. Gonzalez* (2008) 43 Cal.4th 905, 934, *People v. Riverside Univ.*
12 (1973) 35 Cal.App.3d 572, 587, *Macmorris Sales Corp. v. Kozak* (1967) 249 Cal.App.2d 998,
13 1005, *Baldwin v. Baldwin* (1947) 82 Cal.App.2d 851, 856.¹ The amount of that compensation is
14 left up to the appointing Court because the appointing court obviously knows the need for the
15 appointment and is familiar with the day-to-day activities therein. *Fenza v. Fenza* (1951) 101
16 Cal.App.2d 678, 680. Commentators are unanimous that when a neutral third party is appointed
17 for real property, that the expenses incurred in the furtherance of the appointment order must be
18 recompensed. Miller & Starr, 12 Cal. Real Est. § 41:22 (4th ed.); 55 Cal. Jur. 3d Receivers § 82;
19 6 Witkin, Cal. Proc. 3th (2008) Prov. Rem. § 459, p. 389.

20 This requirement that an appointed third party be paid for time and costs incurred in a
21 matter is self-explanatory, as courts third party neutrals do not often involve themselves in often
22 contentious litigation without assurance of payment. And as there is often insufficient time or
23 evidence early in a proceeding for the appointing court to explicitly state how a receiver is to be
24 paid, the above clear case law has arisen to assure that receivers recover their fees and costs from
25 the appropriate party, as determined by the appointing Court, once the necessary findings of fact
26 are made or the underlying disputes are resolved. Here, the appointment orders could not have
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28 ¹ For an in-depth and annotated explanation of this concept and general rule, see Miller & Starr, 12 Cal. Real Est. § 41:17 (4th ed.).

envisioned five years of litigation or a separate jury trial -- so the fees and costs at issue were not dealt with prospectively. The specific defense fees incurred by the Prior Receiver, and his outside counsel are addressed below at Section IV, but both receivership and defense costs have to be paid, and should be paid for by the owner of the receivership Properties.

The case law on a receiver's right to be paid is absolutely clear. But that case law (based on the basic equity that a court agent should be assured payment for his own and his defense costs) was actually codified recently. Health and Safety Code §17980.7(c)(15) is clear on the Court's authority: "Upon the request of a receiver, a court may require the owner of the property to pay all unrecovered costs associated with the receivership in addition to any other remedy authorized by law." This section was added in 2012 through AB 2314 (taking effect January 1, 2013), but simply codified existing law summarized above. In this way, the Legislature actually made it explicit in the statute that property owners like Respondents here, are to personally pay all unrecovered fees/costs/advances stemming from a Court appointing a neutral third party to take over their properties.

In this case, there were two separate appointment orders. The first was in March of 2011, and the second in October of 2011.² The Court requested reports and a recommendation within 30, then 47 days on dozens of units and hundreds of violations. Quite a bit of prep work was done, and then work complying with the terms of the Order to prepare those reports and the key information. Then, after that, the Receiver had to expend tens of thousands of dollars in defense costs. The Court had found that the properties were "substantial endangerments" to the public, so it is clear that a receiver would be expected to do prep work, and to move fast after appointment. For obvious reasons, substantial preparations are necessary for a receiver to seize 26, or six, receivership properties that are so dangerous and degraded as to need a neutral, third party to take control.³ The receivership fees and costs must be paid, either by the properties themselves,

² This was before §17980.7(c)(15) became law, but the underlying case law summarized on the previous page requiring a property owner to pay the receivership fees and costs had been in place for some time already.

³ By way of analogous case that is close both in time and geographically, in the matter of *City of Eureka v. South* (Case #CV100345), this very Court appointed Adams as receiver for 1805 Second Street, Eureka, CA on June 4, 2011. The property had burned in late May, 2011, and the City petitioned for appointment on June 2, 2011. Adams visited the site, obtained a demolition bid on June 3, and five days after appointment on June 9, submitted a First Report with the request for authority to demolish the remaining damaged structures, and the financial structure

1 or through an order as against the Squiresees personally. The time spent on the receivership,
2 including before appointment, was necessary and reasonable, and must be paid.

3 4 **IV. THE RECEIVERSHIP DEFENSE FEES MUST BE PAID**

5 Similar to the requirement that receivership fees and costs be paid as discussed in Section
6 III, the potential fees and costs a receiver might incur in defending against challenges to his
7 actions are similarly required to be paid by case law. A receiver is required to present his billings
8 and his work for review and challenge by the parties, and when that work is challenged
9 unsuccessfully, the receiver is not expected to pay his own defense costs. Coupled with semi-
10 judicial immunity, the assurance that a receivers' legal defense costs will be paid is part of the
11 protection that if a court agent accepts an appointment, he will not be left to pay the costs of
12 defending that work. If it were the case that a receiver could not recover for those defense costs,
13 no receiver would ever accept an appointment upon property whose owner had shown signs of
14 being litigious, let alone one willing to spend five years to take a spurious, bogus claim to trial.

15 In reviewing the law on a receiver's defense fees recovery, the most instructive case is
16 *Macmorris Sales Corp. v. Kozak* (1967) 249 Cal.App.2d 998. There, a receiver was appointed for
17 a car lot, found that the lot had a variety of problems and debts to the point that it should no
18 longer operate. *Id.* at 1001. He requested and the Court approved the sale of the cars, and the
19 owners later alleged that he had sold the cars for only 66% of their value. *Ibid.* The Court
20 approved the request to retain counsel to defend himself, and later ordered that the receiver's
21 counsel be paid in full, *ibid.* The Court of Appeals agreed, and found that a claim that a receiver
22 should not hire counsel, or should be forced to pay for the defense against an unsuccessful
23 challenge unpersuasive. *Id.* at 1004-05.

24 Appellants correctly point out that the attorney was employed not to preserve the
25 estate but to protect the receiver when his account was challenged. It is of course

26
27 necessary to accomplish that. Given the dangerous condition of the framed property, it was imperative that the
28 structure be demolished as soon as possible, and much of the preparatory work needed to be done before the actual
appointment. When there are extenuating circumstances and a property that is substantially endangering the public,
the receiver should not be punished for doing preparatory work. There is a risk of doing that work if a receiver is not
appointed, but that was not the case on 2nd Street, and was not the case here.

1 an indispensable part of the receiver's duties to file an accounting and submit
2 himself to inquiry and attack by those beneficially interested in the estate. In this
3 case the attack which was threatened was much more than routine. Items
4 aggregating approximately \$60,000 were called into question, with a request that
5 the receiver be surcharged. The attorney for the objectors announced his intention
6 to conduct a three-day trial. The receiver could expect to be a witness. Although
7 himself a member of the bar, he could hardly be expected to act in propria
8 persona, conducting a trial of such gravity and complexity, examining witnesses
9 and making objections and arguments. It was necessary and proper that the
10 receiver have the assistance of counsel. Since the record shows that the charges
11 against him were unfounded, and that his report and account as submitted by him
12 were regular, the cost of preparing for the contest and appearing in it can only be
13 regarded as necessary expense incurred in the course of his official duties, for
14 which he is entitled to reimbursement out of the estate.

15 *Ibid*. In a nutshell, a receiver is required to expose himself to inquiry and attack, and thus, the
16 defense costs associated with that have to be paid by the receivership property or owner if those
17 attacks result in no showings of wrong doing. See *People v. Riverside Univ.* 35 Cal. App. 3d
18 572, 587 ("In this connection it is to be noted that the cost of defending against an unfounded
19 challenge to a receiver's account is regarded as a necessary expense incurred in the course of his
20 official duties for which he is entitled to reimbursement out of the estate.") citing *Macmorris*.⁴

21 The exact same situation as addressed above is the case here (although the *Macmorris*
22 events spanned two months, and this case over five years). Here, the Receiver was appointed,
23 and the property owner objected to the Prior Receiver's conduct. A trial was held, where Adams
24 and his staff could expect to be witnesses. A verdict was entered, and like in *Macmorris*, a
25 finding was issued by the court that the "charges against him were unfounded." The Judgment on
26 Jury Verdict for Humboldt County Superior Court Case # DR 110803 (*Squires et al v. Adams et*
27 *al*) is currently being prepared by the Prior Receiver's attorney, Neal G. Latt, and will be
28 submitted to the Court upon the receipt of the file-stamped court copy. The verdict that this
Court was waiting on has come in, and thus the fees are to be paid. Those legal costs in
successfully defending against unwarranted and spurious legal claims are exactly the type of
receivership legal fees that California law requires to be paid.

⁴ A federal suit filed against a state court receiver acknowledge that receivers can be "lightning rods for litigation,"
because they are appointed to undertake difficult tasks, in contentious situations, and that was why quasi-judicial
immunity is applied. See *Hatch Development Corp. v. Greenbaum* (9th Cir. 1989) 869 F.2d 1298, 1303, citing
Admiral Corp. v. Batten Credit L. Thrifts Finance (1st Cir. 1976) 547 F.2d 1, 2.

1 Respondents here could have had their alleged trespass claims heard in this proceeding,
2 but instead decided to needlessly waste judicial and receivership resources to hold a jury trial on
3 their claims. 65 potential jury members lost two work days, and 14 jury members spent five work
4 days hearing claims for trespass and invasion of privacy that were found to be entirely without
5 merit. What happened here is that the Respondents filed a lawsuit to scare off the Prior Receiver,
6 and try to intimidate him from serving in the role that he was twice appointed to. The Prior
7 Receiver tried to settle and walk away, but Respondents would not. And so Respondents
8 nonsense claims actually went to trial, and everyone (this Court included) had to waste time on
9 the claims as if they were not so clearly nonsense. In essence, the Prior Receiver called
10 Respondents' bluff about their worthless, meritless lawsuit, and California law requires that
11 those fees be paid.

12 Here, this Court already stated its intention to wait until *Squires v. Adams* had been
13 completed, and if any of the allegations of the Squires were found to be true in that case, that this
14 Court might review those fees in a different way. That case has been completed, and the jury did
15 not find for any of the Squireses' claims. They did not find that Adams trespassed, intruded upon
16 private affairs, or inflicted emotional distress. They did not find that Adams exceeded the scope
17 of the court's appointment, or got ahead of this Court in any way. What was found there, was
18 that Adams was doing preparatory work for an appointment, and that he never stepped outside of
19 the bounds of what might be proper in doing such work. In short, Respondents filed a harassing,
20 worthless lawsuit, that when brought to trial was exposed for the fraud it was. Adams stayed in
21 the case, hired outside counsel, and prevailed. And now this Court should follow the 100+ years
22 of case law and order Respondents to pay for the damage their lawsuit caused.

23
24 **V. THE RECEIVERSHIP FEES/COSTS/ADVANCES ARE TO BE PAID EITHER**
25 **THROUGH A RECEIVER'S CERTIFICATE AND/OR AN ORDER AGAINST THE**
26 **OWNERS PERSONALLY**

27 This Court previously entered an order directing the Respondents to pay off the incurred
28 fees and costs during the two periods of appointment, and at the same time authorized the

1 issuance of a Receiver's Certificate, secured by all of the receivership properties, for the amount
2 owed. There is no reason why the Court should not do the same again, but this time for the
3 entirety of the receivership and legal fees, and costs now that the trial is completed. As laid out
4 below, the Court is to hold the receivership Properties responsible for the receivership and legal
5 costs, but it can also order those fees and costs be paid directly by Respondents. The named
6 Respondents Floyd Squires, Floyd L. Squires, Floyd E. Squires III, Betty J. Squires, FB Squires
7 Family Trust, and Betty J's Building, Inc. were already ordered to pay the portion that the Court
8 approved while the tort suit was pending. Now the tort suit is completed, and the Court should
9 approve the balance.

10 The legal principles behind the previous, and newly-requested order are long-standing:
11 "[a]s a general proposition the costs of a receivership are primarily a charge upon the property in
12 the receiver's possession and are to be paid out of said property. However, this is not an
13 invariable rule. In many cases a direct liability is imposed upon the parties to the action, or upon
14 some of them, for the remuneration of the receiver. Such direct liability may result from an
15 irregularity in the appointment, insufficiency of the property, agreement of the parties, etc."
16 *Andrade v. Andrade* (1932) 216 Cal. 108, 110 citations omitted. In that case, the plaintiff
17 petitioned to have a receiver appointed for a property owned by defendant in which the plaintiff
18 claimed an interest. The plaintiff was found not to have an interest in the property. Therefore,
19 rather than assessing the receiver's fees on the defendant who neither sought nor benefited from
20 the receivership, the court affirmed the trial court's order directing the plaintiff to pay the
21 receiver's fees. The same equitable principles of assigning costs to the party responsible for the
22 costs apply here.

23 In this case, Respondents filed a lawsuit as a challenge to the Receiver and the Receiver's
24 actions undertaken in accordance with this Court's rulings and orders. The jury found
25 Respondents' lawsuit to be completely unfounded, and found there was no trespass. To repeat -
26 not just that there were no damages, or that there was a trespass but there as a defense. The jury
27 in *Squires v. Adams* heard nearly three days of trial and found there was no trespass. The Prior
28 Receiver and his employees had not done anything wrong.

1 Therefore, rather than forcing the Receiver to bear the costs of a lawsuit which the
2 Receiver neither sought nor benefited from, the Court should direct the Respondents to pay for
3 the costs of their own lawsuit. Respondents here used the lawsuit as a bludgeoning tool, and
4 continued to up the ante in that lawsuit to the point that it had to actually go to trial. They made
5 their play, and the tactics were exposed for what they were. So now California law requires them
6 to pay for the fees/costs/advances that they necessitated with their meritless lawsuit. The amount
7 of the fees is left entirely to the appointing court's discretion.⁹ *Baldwin v. Baldwin* (1947) 82
8 Cal.App.2d 851, 856. But the cases are absolutely clear: the fees must be paid, and an order
9 directing the owner to personally pay them is proper. That is exactly what this Motion requests.

10 This Court is vested with the widest possible discretion in ordering Respondents to pay
11 the \$223,713.39 in fees and costs through July 31. These have gone mostly unpaid while the
12 trespass tort suit was pending. Previously, when the Court approved \$15,317 in Adams'
13 receivership fees, costs and advances, it ordered Respondents personally, jointly and severally to
14 pay that amount. In the same order, it authorized a Receiver's Certificate in that amount, to be
15 secured by all of the receivership properties.¹⁰ The Proposed Order here contains the same
16 authority, and there is no reason why this Court should change course for any of the awarded
17 fees and costs here. These are the same fees and costs that this Court previously approved, except
18 with the addition of the fees and costs that this Court stated an intent to wait until the end of the
19 tort suit to rule on. The Court does not even have to issue a new Certificate, it can just increase
20 the existing Certificate to update it to the amount owed through July 31, 2016.

21 Adams attempted multiple times to explain this to Respondents, going back even to
22 November 3, 2011, when he emailed counsel about withdrawing the frivolous lawsuit. Adams
23 filed three demurrers, each time making it clear that there was no merit to the case. Respondents
24 in turn then shifted their claim, alleging that Adams entered into all of the units, blew past "No
25 Trespassing" signs, and even threatened the tenants with arrest. Of course, this was entirely false.

26 ⁹ For example, in *Melikian v. Aquila, Ltd.* (1998) 63 Cal.App.4th 1364, 1368 a receiver was paid his standard hourly
27 rate, plus 4% of the \$3.5 million sale price, and that compensation package was within the Court's discretion.

28 ¹⁰ The Court's authority to grant priority for a Certificate to pay fees is addressed in *glye Schreiber v. Dutch Road
Investors* (1980) 105 Cal.App.3d 675, 680. For priority for receiver's certificates generally, see *Telle Inc. & Trust
Co. v. California Development Co.* (1945) 171 Cal. 227, 231.

1 and that is what the Jury found in *Squires v. Adams*. Respondents could at any time have stopped
2 the accrual of those fees. Adams even offered to just walk away from the matter if the
3 Respondents just paid the \$15,317 that this Court *had already ordered them to pay*. But
4 Respondents did not, and chose to take their absurd claims to trial. Thus, Respondents are not
5 only legally responsible for the costs, and required under California law to pay them, there is a
6 clear logical and moral linkage that requires them to pay the legal fees. Truly, Respondents
7 should be happy that the costs of trial were actually relatively low, because even when defending
8 against nonsense claims, trial defense can be extremely expensive. The Prior Receiver took a risk
9 in limiting his own and his counsel's trial costs, and that paid off in getting the correct jury
10 verdict despite those limited fees. That was in essence to the Respondents' ultimate benefit.

11 Further, it is absolutely necessary that a receiver appointed by a court be assured that the
12 fees and costs incurred will be paid – even if those are paid five years later, and after that
13 receiver had to go to trial against a set of spurious tort claims. If those fees and costs are not paid,
14 no receiver would accept an appointment when a property owner has shown any willingness to
15 spend money on aggressive attorneys. No receiver would accept appointments if he is to be left
16 dangling in the wind when a property owner goes on the offensive. This matter is essentially a
17 very simple one – the Court previously approved the fees incurred during the time of
18 appointment, and put off any decision as to the other remaining fees – including pre-appointment
19 fees and Receiver's defense attorney fees – for once the trial was completed. And now that the
20 trial is completed, the Receiver was cleared of any wrong-doing, those fees have to be paid. This
21 Court should order the Property owners to pay those fees, and authorize the Receiver to record
22 an increased Certificate to cover the amount owed if that amount is not immediately paid. Five
23 years is long enough for Mr. Squires to avoid paying for the costs of the receivership, and the
24 defense costs that his spurious, meritless and worthless tort suit caused.

25 26 VI. FEES OWED

27 There is a total of \$223,715.34 of fees, costs and advances owed. That includes all of the
28 receivership time, fees, expenses, costs, advances, etc., as well as the defense costs, \$150,606.49

1 of that was billed by California Receivership Group employees, and there were \$37,937.65 in
2 advances and expenses. \$35,171.25 was billed by CRG's outside trial counsel, Mathews, Kluck,
3 Walsh & Wykle ("outside counsel").⁷ As explained above, the receivership fees and costs and
4 the defense fees and costs are equally as recoverable. California law requires that both categories
5 fees and costs be repaid, and this Court has the widest possible discretion both in ordering those,
6 and in setting the process by which they are recovered. The detail on these numbers is below, but
7 also in the attached Declarations of Mark Adams, Andrew Adams, and the exhibits thereto.

8 The propriety of those fees and costs is detailed at length in the attached invoices for
9 CRG and the outside counsel. Every single billed minute is explained, and both Andrew Adams
10 and Mark Adams have reviewed those billings for accuracy and necessity. The billing rates
11 involved are all below market – and would be low for any legal market in California. Thus, they
12 are inherently reasonable. And the amount of time spent on the receivership, and then the time
13 billed for bringing a five-year long litigation process to trial is equally reasonable and below
14 market. In short, this Court would be justified in approving much more in the way of
15 receivership and counsel fees – but certainly is justified and directed by law to order at
16 \$223,715.39.

17 **a. Receiver fees, costs and advances**

18 Through July 31, 2016, there are a total of \$150,606.49 in unpaid receivership fees, costs
19 and advances are owed. These are the receivership fees and costs, the CRG legal fees and costs,
20 and basically all the time that was billed to the receivership and the tort suit since the original
21 2011 appointment. It includes travel expenses, bond costs (recoverable under Code of Civil
22 Procedure § 567), all hourly fees incurred, and every other receivership expense. Attached to the
23 Declaration of Mark Adams as Exhibit 6 is a detailed, month-by-month, employee-by-employee
24 breakdown of the fees requested. In addition, there were \$37,937.65 of advances and expenses
25 that had to be paid. Those are detailed in the Profit and Loss Statements attached as Exhibit 7.

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27
28 ⁷ Again, trial counsel's retention was specifically approved in *Macintosh Sales Corp. v. Aerial* (1967) 249
Cal App.2d 998, 1005.

The Court can see that over half of these fees were incurred in 2011 and 2012, when the Court appointed the Receiver and the early stages of the tort suit were proceeding. This Court will remember that there was substantial discovery requests in the tort suit, requiring motions for protective orders, motions to compel and the like. All for a supposed trespass claim that the jury took less than a day to resolve on all questions, and never even made it to the defenses on, because they found that no trespass took place. The amount of CRG fees are broken out by year below:

Year	CRG Fees, Costs and Advances
2011	\$38,783.35
2012	\$41,006.75
2013	\$17,191.71
2014	\$23,707.51
2015	\$12,544.17
2016	\$17,373.00

As shown above, 53% of all the billed time came in 2011 and 2012. And of the 2012 time, over half of the 2012 was billed by April, which reflects much of the timing of the receivership. During that period there were periodic appointment hearings, preliminary inspections, etc. This Court heard testimony from Mark Adams, and reviewed five reports in this matter. This was the same for the early tort case work - so much of the early demurrers and discovery work ate up the fees and costs. And the trial, in July 2016, required only \$16,775 in billing - \$1,330 from Mark. Even with the below trial counsel costs (which themselves were extremely low for such a complex, multi-day trial) it is clear that Adams and CRG have been actively working to keep their time and costs involved as low as possible. That was borne out in the billings attached as Exhibit 6, where the Court can see that Andrew Adams (at the much lower billing rate) had a cumulative \$67,811.64 billed during the five+ years, and Mark Adams (at \$350/hour) billed \$80,246. None of the other employees even broke \$2,000, with Tyler Huxtable, who is a paralegal, at the third most billings at \$1,510. These are not the billings of attorneys or staff trying to bill substantial amounts to a case; these are the billings of attorneys

1 trying to spend as little time as possible while still properly lending off an abusive, meritless
2 lawsuit.

3 This amount is inherently reasonable. And even though this Court did not oversee the
4 trial, it did oversee every part of the adversarial case up until trial. So the Court is aware of what
5 was required of the Prior Receiver both in the receivership and in *Squires v. Adams*. By way of
6 example, in *Melikian v. Aquila, Ltd.* (1998) 63 Cal.App.4th 1364, 1368 a receiver was paid his
7 standard hourly rate, plus 4% of the \$5.5 million sale price, and that compensation package was
8 within the Court's discretion. So for this Court to simply order that the fees and costs that this
9 Court' preemptively approved in the appointment order be paid, should be an easy decision. The
10 Receiver here is not asking for a bonus, or a punitive award as against Respondents for wasting
11 five years of time on their worthless litigation. All the Prior Receiver is requesting is the actual
12 billed time for the receivership and the adversarial defense that this Court has already approved
13 in principle. And that total of \$223,715.39 for five+ years of litigation is inherently reasonable.

14 And this was a risky strategy. Although the tort claims were clearly bogus, and meant
15 only to harass, they were serious claims and brought into account the Receiver's integrity and
16 aptitude for his job. So while there was a strong push to keep those costs low, the trial issues
17 could not be ignored and trial prep could not go undone. The issues were simple – was there a
18 trespass – but the trial still required preparations. This Court can review the billings for the
19 counsel and for CRG (again Mark Adams, the Receiver here spent only 3.8 billed hours on this
20 in July 2016), and see that if anything, the time billed is inadequate to actually prepare for a trial,
21 but nothing wasteful will be found.

22 As noted in the Declarations and as already heard by this Court, Mark Adams is the most
23 experienced health and safety receiver in the state. He has practiced law for over 40 years, and
24 has been appointed on 130+ similarly dangerous properties throughout the state. His degrees
25 from LMU undergrad and Georgetown Law serve him and his work well. Similarly, the CRG
26 staff is qualified, with degrees from UCLA, UC Berkeley, USC, and USD Law. Adams bills
27 \$350/hour, less than 1/2 what many of his competitors do, and the staff rates go down from there.
28 In short, the billing rates for all of CRG are kept purposefully low because the fees incurred are

1 mandatory, and so they are more than reasonable. In this case, the vast majority of work done
2 was by Andrew Adams, not Mark, who started at \$150/hour (\$200/hour less than Mark). That
3 hourly rate increased to \$250/hour, but it was still much cheaper than the Court's own approved
4 rate for Mark of \$350/hour. A rate sheet for CRG is attached as Exhibit 9.

5 Thus, in this case, where there were two separate appointments – the first for 26
6 properties, and the second for six, and those properties all required individual analysis and
7 reports due in 30-45 days with recommendations due to the Court – AND where the property
8 owner sued the Receiver improperly for *trespass* and the Receiver had to defend himself at trial,
9 all over a period of over five years, \$150,606.49 is an astonishingly low number for the demand.
10 The receivership fees/costs/advances and the defense costs of CRG are all absolutely reasonable,
11 and would be so at double the amounts billed. This Court must order those fees/costs/advances
12 paid in full.

13 **b. Receiver's Counsel's Fees, Costs and Advances**

14 The Receiver and CRG here retained Neal Latt, of Mathews, Kluck, Walsh & Wykle,
15 LLP to represent him at trial. Mr. Latt is a very able trial counsel, but also very much below
16 market at the \$200/hour that he billed for this work. The Court will remember that the Receiver
17 was denied his request to have Squires pay the invoices as they came in, so Mr. Latt's invoices
18 were a risk that the Receiver had to take – and a cost that had to be fronted. Had he lost at trial,
19 and a trespass having been found, or any other improper activity, surely this Court would have
20 been less inclined to order those fees paid.

21 Since Mr. Latt's retention in May of 2014, he oversaw the entire trial, and the trial prep.
22 And the cost for this was a total of \$35,171.25 for all the legal fees, and the costs associated. By
23 any standard, \$35,171.25 for a four-day trial with complicated legal issues is a bargain. But it
24 also included some of the discovery disputes, the filings leading up to the appointment, various
25 settlement discussions, and then multiple trial setting conferences. \$35,171.25 for trial is an
26 absolute steal, particularly for an attorney of Mr. Latt's training and skill level.

27 As the Court and the parties can see as well, those invoices include billings only for Mr
28 Latt, save 1.8 hours of time. It was .5 hours of review by a senior partner regarding appellate

1 issues, and 1.3 hours for a partner's appearance at a trial setting conference. Mr. Latt, despite his
2 skill has only approximately four years of time practicing, and so the Court can see that much of
3 the time spent by senior partners or any other staff in assisting the case's preparation must have
4 been done without billing. In short, the amount billed was remarkably low for Mr. Latt and his
5 trial skills. Surely, the Squireses' counsel billed much more for their time spent wasting the
6 Court and the Receiver's time.

7 These fees, like the previous receivership fees were requested from the Court, and on
8 September 9, 2014, the Court denied leave to retain Neal Latt based upon the fact that the
9 allegations of *Squires v. Adams* were that Adams exceeded any authority that he might have on
10 October 5-6, 2011. The Jury did not agree with the allegation, and thus now the demand is put to
11 the Court again. The Court should see no reason to reverse the previous plan to affirm the fees
12 should the jury find that there was no improper action on Adams's part.

13 Receiver's counsel is worth much more than the amount billed on this case. Neal Latt has
14 been practicing for approximately four years at this point, and attended Yale University for
15 undergraduate studies, and Golden Gate Law School for his J.D. His \$200/hour rate is from 2014
16 and he did not raise that during the representation. His hourly rate, the hours billed, and the
17 overall total cost for the trial is inherently reasonable, and in fact far, far below market.

18 19 VII. CONCLUSION

20 Thus, for the reasons stated above, and in the attached Declarations, this Court should
21 order the named Respondents to pay the unpaid receivership fees and costs, and Receiver's
22 attorney fees in the amount of \$223,715.39.

23
24 Dated August 10, 2016



25 Mark Adams, Receiver

26 //

27 //

28 //

1 MARK S. ADAMS, SB#68300
ANDREW F. ADAMS, SB#275109
2 California Receivership Group, PBC
2716 Ocean Park Blvd., Suite 3010
3 Santa Monica, California 90405
Tel. (310) 471-8181
4 Fax (310) 471-8180
madams@calreceivers.com
5 Court-Appointed Receiver

6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF HUMBOLDT
9

10 CITY OF EUREKA, a municipal
11 corporation, ("the City") and the PEOPLE
OF THE STATE OF CALIFORNIA, ("the
12 People") by and through Jones & Mayer,
Special Counsel of the City of Eureka.

13 Petitioner.

14 vs.

15 FLOYD SQUIRES; FLOYD E. SQUIRES;
16 FLOYD E. SQUIRES III; BETTY J
SQUIRES; FB SQUIRES FAMILY
17 TRUST; BETTY J'S BUILDING, INC; and
DOES ONE through SIXTY.

18 Respondents.
19
20

Case No.: DR110040

DECLARATION OF MARK ADAMS

Date: September 9, 2016
Time: 8:30 a.m.
Dept.: 4

21 I, Mark Adams, declare as follows:

22 1. The following is true and correct to the best of my knowledge. If called upon to
23 do so, I could and would testify competently thereto in a court of law.

24 2. At this time, there is \$223,715.39 in outstanding fees, costs, advances and
25 expenses. This includes the repayment of funds loaned based on the previous Certificate. Thus,
26 the total Receiver's Certificate requested is \$223,715.39, and the amounts that make up that total
27 are detailed below.
28

1 3. On January 18, 2011 the City of Eureka ("City") filed a complaint with various
2 allegations, and requested the emergency appointment of a receiver. That Application requested
3 that the Court appoint me, Mark S. Adams, as receiver under Health and Safety Code
4 §17980.7(c). The Court denied the request on February 3, 2011, and then held a hearing on
5 February 28, 2011 on the same issue.

6 4. I was appointed first as a provisional receiver on March 10, 2011, and directed to
7 inspect the Properties and develop a report with recommendations. That Order is attached as
8 Exhibit 1. That Order was appealed on March 11, and stayed by way of the filing of an
9 undertaking on March 21, 2016.

10 5. The City again brought a request to appoint me, and on September 28, 2011, this
11 Court ruled that the application was granted. I sent Andrew Adams to begin discussions with
12 tenants and to inform the tenants and neighborhood about the Ruling, and he did so on October 5
13 and 6.

14 6. Respondents Floyd Squires III, Betty J. Squires and five of their tenants filed a
15 complaint alleging trespass and intentional invasion of Privacy against me, Andrew Adams, and
16 CRG LLC on October 19, 2011, fourteen days after the supposed trespass took place, and the
17 same day they filed an Objection to my appointment as Receiver. The Order appointing me as
18 Receiver was signed October 24, 2011, which was appealed on October 25, and the undertaking
19 filed approximately November 2, 2011. That Order is attached as Exhibit 2.

20 7. That tort case progressed and actually went to trial on July 18-22, 2016 before
21 Judge Feeney in Humboldt Superior Court. The Jury in that case returned its verdict on July 22,
22 and found for Mark Adams, Andrew Adams and CRG on every single cause of action.

23 8. Based on my experience as a Receiver, I know that these types of tort lawsuits are
24 somewhat common. I know that taking these claims to trial is absolutely uncommon though. And
25 now that the trial is done and the Squireses' claims have been heard, the Court's requested time
26 to hear this Motion for fees has come. The Court previously denied the defense costs, without
27 prejudice, inviting the current Motion for fees and costs.

28

DECLARATION OF MARK ADAMS

1 9. As of November 2, 2011, CRG was owed \$37,983 and \$3,571 in advances. Over
2 the next three months, \$22,466 was incurred. On February 20, 2012, I submitted a Second
3 Report, requesting payment of the \$65,494 in fees and advances in this matter. This covered the
4 two appointments and the preliminary work.

5 10. In a September 4, 2012 Tentative Ruling, this Court granted the fees incurred
6 during the two appointments prior to the appeal and the filing of the undertaking, but at the same
7 time denied without prejudice all other fees for review after the trial in *Squires v. Adams* was
8 completed. The Tentative Ruling is attached as Exhibit 3.

9 11. On June 19, 2013, I submitted a Third Report, requesting that the Court consider
10 the equities, and award at least some of the over \$80,000 of fees and costs then owed. That
11 Report state "I am a professional receiver without a personal interest in the matters surrounding
12 this litigation. I ask that I be paid for the time I've billed and money I've advanced to this case in
13 reliance on the Court's previous orders."

14 12. On September 13, 2013, this Court issued a Ruling denying the request for fees,
15 except for the fees and costs incurred during the two periods in between the appointment order
16 and the entry of the undertaking staying those orders. The defense fees were denied without
17 prejudice. A copy of that Ruling is attached as Exhibit 5. On the same day, this Court appointed
18 Jeffrey Smith as the replacement receiver for the *Squires* properties.

19 13. On January 9, 2014, Judge Dale A. Reinboltson issued an Order following the
20 September 13, 2013 Ruling, finding that Floyd Squires, Floyd E. Squires III, Betty J. Squires, FB
21 Squires Family Trust, and Betty J's Building, Inc. were jointly and severally liable for the
22 \$15,317 in then-awarded fees and costs. That Order is attached as Exhibit 4. The Order also
23 authorized Adams to issue a super-priority Receiver's Certificate in that amount, which is to be
24 secured by a deed of trust on all 26 properties. The Order also authorized Adams to issue a
25 super-priority Receiver's Certificate in that amount, which is to be secured by a deed of trust on
26 all 26 properties.

27 14. Respondents filed a February 21, 2014 Motion for Reconsideration, which was
28 heard on March 3, 2014 and denied on September 8, 2014.

1.
DECLARATION OF MARK ADAMS

1 15. On June 19, 2014, I filed an Application requesting that the Court authorize the
2 Receiver to hire trial counsel under 3.1180. On September 8, 2014, the Court denied without
3 prejudice the request, so as to let the trial proceed and come to a result before authorizing
4 counsel or approving the payment.

5 16. Attached as Exhibit 6 are the invoices for myself and all California Receivership
6 Group employees from the beginning of this matter through July 31, 2016. The total amount of
7 the billings for that period is \$150,606.49. Of that amount, all are unpaid because none of the
8 awarded fees, nor the Certificate have been paid off.

9 17. Attached as Exhibit 7 are the profit and loss statements detailing the \$33,937.65
10 of advances. In addition to that, there was a \$4,000 bill for the bonds in this matter. Thus, the
11 total amount of advances that I and CRG have made totals \$37,937.65.

12 18. All time billed by myself and CRG in this matter is detailed in the invoices, and I
13 have reviewed all the invoices. I know that the time spent was necessary, and was a valid
14 expense under the Appointment Order. And I know that all of the billing rates in those invoices
15 are reasonable, and actually below market rates for similar employees and receivership staff. In
16 particular, I know that my own rate of \$350/hour, and that of Andrew Adams at \$150-250/hour is
17 more than reasonable, and below market.

18 19. Attached as Exhibit 8 are the invoices from my defense counsel, Neal Latt, of
19 Mathews, Kluck, Walsh & Wykle, totaling \$35,171.25. A total of \$14,604.18 is outstanding, and
20 I plan to advance funds to pay that amount by September 1, 2016.

21 20. A current billing rate sheet for California Receivership Group is attached as
22 Exhibit 9.

23 21. I have reviewed all of the invoices and billing records attached and know that the
24 time spent was necessary, and was appropriate under the Appointment Orders.

25 22. I also am familiar with the billing rates of the attorneys and staff involved, and
26 know them to be reasonable billing rates for those involved.

27 23. Thus, the accumulated amount of fees, costs and advances currently owed to both
28 California Receivership Group and Mathews, Kluck, Walsh & Wykle are \$223,715.39.

+

DECLARATION OF MARK ADAMS

1 24. I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3
4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct. Executed this 10th day of August, 2016 at Santa Monica,
6 California,

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10 Mark Adams, Prior Receiver

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3
DECLARATION OF MARK ADAMS

1 MARK S. ADAMS, SB#68300
2 ANDREW F. ADAMS, SB#275109
California Receivership Group, PBC
2716 Ocean Park Blvd., Suite 3010
3 Santa Monica, California 90405
Tel. (310) 471-8181
4 Fax (310) 471-8180
madams@calreceivers.com
5 Court-Appointed Receiver

6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF HUMBOLDT
9

10 CITY OF EUREKA, a municipal
11 corporation, ("the City") and the PEOPLE
OF THE STATE OF CALIFORNIA, ("the
12 People") by and through Jones & Mayer,
Special Counsel of the City of Eureka.

13 Petitioner.

14 vs.

15 FLOYD SQUIRES; FLOYD E. SQUIRES;
16 FLOYD E. SQUIRES III; BETTY J.
SQUIRES; FB SQUIRES FAMILY
17 TRUST; BETTY J'S BUILDING, INC; and
DOES ONE through SIXTY.

18 Respondents.
19
20

Case No.: DR110040

DECLARATION OF ANDREW ADAMS

Date: September 9, 2016
Time: 8:30 a.m.
Dept.: 4

21 I, Andrew Adams, declare as follows.

22 1. The following is true and correct to the best of my knowledge. If called upon to
23 do so, I could and would testify competently thereto in a court of law.

24 2. I am employed by California Receivership Group and Mark Adams in this matter,
25 and participated in both the underlying receivership, and the resulting tort suit that went to trial
26 in Humboldt Superior Court, July 18-22, 2016.

27 3. I have reviewed the attached billings of CRG as Exhibit 6, and the Mathews.
28

-1-
DECLARATION OF ANDREW ADAMS

1 Kluck, Walsh & Wykle billings attached as Exhibit 8 and believe them to be a true and accurate
2 billing record for the time spent on the receivership and the defense. The advances are detailed in
3 Exhibit 7. Having overseen over 45 receiverships and many challenges made to work done in a
4 receivership, I know that the total amounts requested here are more than reasonable for the
5 defense for a matter like this. The billing rates of all involved are far below market, and the
6 amount of time spent both on the receivership, but particularly on the defense of the actions
7 taken was much less than was expected.

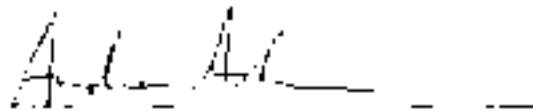
8 4. I have reviewed all of the invoices and billing records attached and know that the
9 time spent was necessary, and was appropriate under the Appointment Orders.

10 5. I also am familiar with the billing rates of the attorneys and staff involved, and
11 know them to be reasonable billing rates for those involved.

12 6. I know all parties working on this matter have substantial unbilled amounts that
13 are not presented here for review. I know from my own experience in a variety of receiverships
14 that a total amount owed of less than \$200,000 is far, far below what would be expected. For
15 many receivers and their staff \$200,000 would cover one year of an intensive receivership like
16 this, let alone five years, with a trial.

17 7. I also am familiar with the work of Neal Latt of Mathews, Kluck, Walsh and
18 Wykle, and personally witnessed much of the work done at trial in the tort suit. I know Neal
19 Latt's work to be of the highest quality, and that his billing rate is far too low for his skill and
20 expertise. The billing rate, and the total trial time costs are eminently reasonable.

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct. Executed this 10th day of August 2016, in Santa Monica,
23 California.

24
25 
26

27 Andrew Adams
28

Exhibit 1

FILED**MAR 10 2011****SUPERIOR COURT OF CALIFORNIA
COUNTY OF HUMBOLDT*****SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT***

THE CITY OF EUREKA, a municipal
corporation, ("the City") and the PEOPLE OF
THE STATE OF CALIFORNIA, ("the
People") by and through Jones & Mayer,
Special Counsel of the City of Eureka,

CASE NO: DR110040

ORDER

Petitioners,

vs.

FLOYD SQUIRES; FLOYD E. SQUIRES;
FLOYD E. SQUIRES III; BETTY J.
SQUIRES; FB SQUIRES FAMILY TRUST;
BETTY J'S BUILDING, INC.; and DOES
ONE through SIXTY,

Respondents.

Petitioner's Renewed Motion for the Provisional Appointment of a Receiver and
Stay of Hearing came on for hearing on March 10, 2011. Petitioners were represented
by counsel Dean J. Pucci and Krista MacNevin Jee, and respondent Floyd E. Squires III
was present represented by counsel Bradford C. Floyd.

The Court, having considered the moving papers, respondent's opposition to the
motion, the declaration of Floyd E. Squires III and the arguments of counsel, grants the

H:\ORDER\DR110040\wgf

- 1 -

ORDER

1 motion for appointment of a provisional referee, with the limited powers set forth in the
2 Order of Appointment filed concurrently with this order and stays the hearing.

4 DISCUSSION

5 This matter came on for hearing on an Order to Show Cause Re: Appointment of
6 Receiver and Issuance of a Preliminary Injunction on February 28, 2011. Testimony
7 was received from Brian J. Gervig, Chief Building Official for the City of Eureka on
8 February 28 and March 1, 2, 3 and 4, 2011. Mr. Gervig was being cross-examined by
9 counsel for respondents when a motion to continue the hearing was granted.

10 Based upon the evidence received at the hearing, as well as the declarations
11 filed in support and opposition to the Emergency Ex Parte Petition and the Order to
12 Show Cause Re: Appointment of a Receiver and Issuance of a Preliminary Injunction,
13 the Court finds that:

14 1. The appointment of a neutral third party to evaluate the alleged violations of
15 the California Health and Safety Code and the Eureka Municipal Code at the properties
16 in question is necessary at this time.

17 2. The parties dispute the nature and severity of the violations, and the amount
18 of work required to correct the violations. The court requires the assistance of a neutral
19 third party to evaluate and decide the issues presented in this case.

20 3. Respondents will not suffer undue prejudice by the appointment of a
21 provisional referee with limited authority because: (1) respondents' expert, Mr. Kemp,
22 shall be authorized to attend each inspection of the properties conducted by the
23 provisional referee; and (2) should respondents be the prevailing party in this matter, all
24 costs incurred by the provisional referee (inspections, evaluations and fees incurred)
25 shall be the responsibility of petitioners.

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- 2 -

ORDER

1
2 ORDER

3 Accordingly, THE COURT ORDERS THAT:

4 1. Mark S. Adams is hereby appointed as the provisional receiver for the
5 properties at issue in this matter.

6 2. The limited powers granted to Mr. Adams shall be set forth in the Order for
7 Provisional Appointment of Receiver filed concurrently with this Order.

8 3. Respondent's expert, Mr. Kemp, is authorized to attend each inspection of the
9 properties conducted by the provisional referee. A representative of the petitioners is
10 also authorized to attend each inspection.

11 4. The hearing in this matter is stayed until Monday, April 11, 2011, or until a
12 later date to be set by the Court with concurrence of the parties.

13 Dated: March 10, 2011

14 *Dale A. Reinholdsen*

15 Dale A. Reinholdsen, Judge of the Superior Court
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- 3 -

ORDER

STATE OF CALIFORNIA,)
COUNTY OF HUMBOLDT) SS. AFFIDAVIT OF SERVICE BY MAIL

I, _____, say:

That I am a citizen of the United States, over 18 years of age, a resident of the County of Humboldt, State of California, and not a party to the within action; that my business address is Humboldt County Courthouse, Eureka, California; that I served a true copy of the attached ORDER by placing said copies in the attorney's mail delivery box in the Court Operations Office at Eureka, California on the date indicated below, or by placing said copies in envelope(s) and then placing the envelope(s) for collection and mailing on the date indicated below following our ordinary business practices. I am readily familiar with this business practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service at Eureka, California in a sealed envelope with postage prepaid. These copies were addressed to:

Dean J. Pucci, Attorney at Law, 3777 North Harbor Boulevard, Fullerton, CA 92835

Bradford Floyd, Attorney at Law – in Court Op's Box #102

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on the _____ day of February, 2011, at the City of Eureka, County of Humboldt, State of California.

KERRI L. KBENAN, Clerk of the Court

By _____
Deputy Clerk



**SUPERIOR COURT OF CALIFORNIA
COUNTY OF HUMBOLDT**

825 Fifth Street, Room 231
Eureka, California 95501
(707) 269-1200

March 10, 2011

TO: Dean J. Pucci, Attorney at Law
Via Fax: (714) 446-1448

Bradford C. Floyd, Attorney at Law
Via Fax: (707) 445-5915

FROM: W. G. Furst, Judicial Secretary

RE: DR110040 - The City of Eureka, et al. v. Floyd Sautres, et al.

TOTAL NUMBER OF PAGES INCLUDING COVER PAGE: 5

This fax is to provided to you as a courtesy, the conformed copy of this order will be served via U.S. Mail.

Exhibit 2

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FILED

OCT 24 2011

SUPERIOR COURT OF CALIFORNIA
COUNTY OF HUMBOLDT

SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT

THE CITY OF EUREKA, a municipal
corporation, ("the City") and the PEOPLE OF
THE STATE OF CALIFORNIA, ("the
People") by and through Jones & Mayer,
Special Counsel of the City of Eureka,

CASE NO: DR110040

ORDER APPOINTING
RECEIVER AND GRANTING
PRELIMINARY INJUNCTION

Petitioners,

vs.

FLOYD SQUIRES; FLOYD E. SQUIRES;
FLOYD E. SQUIRES III; BETTY J.
SQUIRES; FB SQUIRES FAMILY TRUST;
BETTY J'S BUILDING, INC.; and DOES
ONE through SIXTY,

Respondents.

The Court, having considered all pleadings in the above-captioned matter and
the testimony presented at the hearing on the Order to Show Cause regarding Appoint-
ment of a Receiver and/or Preliminary Injunctive Relief, and good cause appearing
therefor, makes the following findings:

1. The following properties (the "Receivership Properties") in the City of Eureka,
are being maintained by Respondents FLOYD E. SQUIRES; FLOYD E. SQUIRES III;

ORDER DR110040Lwgf

ORDER APPOINTING RECEIVER AND
GRANTING PRELIMINARY INJUNCTION

1 BETTY J. SQUIRES; (collectively "Respondents" herein) in conditions which constitute
2 a substantial endangerment to residents and members of the general public, due to lack
3 of egress, light, ventilation and/or general dilapidation:

4 (a) 117/119 Fifth Street (APN 001-071-004);

5 (b) 315 C Street (APN 001-066-001);

6 (c) 1637 Third Street (APN 002-053-005);

7 (d) 1233 A Street (APN 004-112-008);

8 (e) 607 Summer/119 W. Sixth Street (APN 001-042-013); and

9 (f) 216 Third Street (APN 001-066-002).

10 2. As to the Receivership Properties, Petitioners are likely to prevail on the
11 merits of their claims at trial in the above-captioned matter.

12 3. As to the Receivership Properties, the interim harm Petitioners, residents and
13 members of the general public may suffer as a result of endangerment to the public
14 health and safety presented by the conditions of the Receivership Properties if a
15 receiver is not appointed and a preliminary injunction granted is greater than the harm
16 Respondents will suffer if an interim receiver is appointed and a preliminary injunction is
17 issued.

18 4. The Court did not find based on the evidence presented and pending a
19 hearing on the Petition for Permanent Injunction, that there was sufficient evidence to
20 appoint an interim receiver or issue a preliminary injunction on the remaining properties
21 identified in the complaint in the above-captioned matter.

22
23 IT IS HEREBY ORDERED:

24 1. Mark S. Adams is hereby appointed, pursuant to California Health and Safety
25 Code section 17980.7(c) as the Receiver for the Receivership Properties, and is

I:\ORDER\DR110040\wgf

1 delegated the following duties and powers immediately:

- 2 (i) Take full and complete control of the Receivership Properties;
- 3 (ii) Manage the Receivership Properties and pay expenses of the
4 operation of the Receivership Properties, including taxes, insurance,
5 utilities, general maintenance and debt secured by an interest in the
6 real property;
- 7 (iii) Secure a cost estimate and construction plan from a licensed
8 contractor for the repairs necessary to correct conditions cited in the
9 notice of Violation on the Receivership Properties;
- 10 (iv) Collect all rents and income from the Receivership Properties;
- 11 (v) Use all rents and income from the Receivership Properties to pay for
12 the cost of rehabilitation and repairs determined by the court as
13 necessary to correct all conditions cited in the Notice of Violation on
14 the Receivership Properties;
- 15 (vi) Subject to the Court's approval, borrow funds to pay for repairs
16 necessary to correct conditions cited in the Notice of Violation on the
17 Receivership Properties; and secure that debt and any moneys owed
18 to the receiver for services performed pursuant to this order with a lien
19 on the Receivership Property(ies). The lien shall be recorded in the
20 county recorder's office in Humboldt County;
- 21 (vii) Exercise the powers granted to receivers under Section 568 of the
22 California Code of Civil Procedure; and
- 23 (viii) Report to the Court any other existing violations of the law at the
24 Receivership Properties, not cited in the Notice of Violation on the
25 Receivership Properties, that constitute a substantial endangerment

\\ORDER\DR110040\lwj

- 3 -

ORDER APPOINTING RECEIVER AND
GRANTING PRELIMINARY INJUNCTION

1 to residents or members of the general public.

2 3. The Receiver shall prepare and file on all parties a First Report of the
3 Receiver no later than November 26, 2011. A hearing on such report shall be held on
4 December 12, 2011 at 2:00 p.m. in Courtroom 8. At the hearing, the Court will also
5 select a date for hearing on the permanent injunction.

6 4. The Receiver shall (1) immediately execute and file a receiver's oath; (2) file
7 the bond required by the Code of Civil Procedure section 587(b) in the amount of
8 \$100,000; and (3) immediately disclose to all parties and financial relationship between
9 the Receiver and any company hired to assist in the management of the Receivership
10 Properties, if such actions have not already been done or have expired.

11 5. The Receiver is further authorized to establish and/or maintain accounts at
12 any financial institutions insured by an agency of the United States government that are
13 not parties to this proceeding and shall deposit and/or maintain in those accounts funds
14 received in connection with the Receivership Properties.

15 6. The Receiver is required to obtain permission from the Court prior to exercising
16 any authority provided in Health and Safety Code section 17980.7, not specifically
17 granted in this Order.

18
19 IT IS FURTHER ORDERED:

20 Respondents shall be immediately and forthwith enjoined from engaging in the
21 following activities:

22 A. Collecting rents from the tenants of the Receivership Properties. (Health &
23 Safety Code section 17980.7(c)(3).)

24 B. Interfering with the Receiver in the operation of the Receivership Properties.
25 [Health & Safety Code section 17980.7(c)(3).]

ORDER\DR110040\wgt

ORDER APPOINTING RECEIVER AND
GRANTING PRELIMINARY INJUNCTION

1 C. Encumbering or transferring the Receivership Properties, or any portions
2 thereof. [Health & Safety Code section 17980.7(c)(3).]
3

4 IT IS SO ORDERED.
5

6 Dated: October 24, 2011

Dale A. Reinholtsen

Dale A. Reinholtsen, Judge of the Superior Court

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- 6 -

ORDER APPOINTING RECEIVER AND
GRANTING PRELIMINARY INJUNCTION

STATE OF CALIFORNIA, :
COUNTY OF HUMBOLDT : 35. AFFIDAVIT OF SERVICE BY MAIL

I, William G. Furst, say:

That I am a citizen of the United States, over 18 years of age, a resident of the County of Humboldt, State of California, and not a party to the within action; that my business address is Humboldt County Courthouse, Eureka, California; that I served a true copy of the attached ORDER APPOINTING RECEIVER AND GRANTING PRELIMINARY INJUNCTION by placing said copies in the attorney's mail delivery box in the Court Operations Office at Eureka, California on the date indicated below, or by placing said copies in envelope(s) and then placing the envelope(s) for collection and mailing on the date indicated below following our ordinary business practices. I am readily familiar with this business practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service at Eureka, California in a sealed envelope with postage prepaid. These copies were addressed to:

Dean J. Pucci, Attorney at Law; 3777 North Harbor Boulevard; Fullerton, CA 92835
- and - Via Fax: (714) 446-1446

Bradford Floyd, Attorney at Law - in Court Op's Box #102
- and - Via Fax: (707) 445-5915

Mark S. Adams, California Receivership Group, LLC; 150 Barrington Avenue,
Suite #100; Los Angeles, CA 90049
- and - Via Fax: (310) 471-8180

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on the 24th day of October, 2011, at the City of Eureka, County of Humboldt,
State of California.

KERRI L. KEFNAN, Clerk of the Court

/s/

By _____
Deputy Clerk, William G. Furst

Exhibit 3

FILED

SEP 04 2012

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF HUMBOLDT**

SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT

CITY OF EUREKA , et al.,

CASE NO. DR110040

Plaintiffs,

TENTATIVE RULING

vs.

FLOYD SQUIRES, et al.,

Defendants.

Before the Court is the Second Receiver's Report; Declaration of Receiver Re: Payment of Fees and Advances filed by Mark S. Adams. The application for payment of fees and advances is opposed by respondents Floyd Squires, et. al. The Court, having considered the papers filed in support and opposition to the Report, rules as follows.

DISCUSSION

Procedural History.

The procedural history is this matter which may be relevant to the matter before the Court is as follows:

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- 1 -

TENTATIVE RULING

1 1. On January 18, 2011, petitioners filed a complaint alleging numerous
2 substandard and unsafe conditions at 26 properties owned by respondents. Petitioners
3 also filed a motion seeking (1) the emergency appointment of a receiver for the
4 properties and a temporary restraining order, and (2) an order to show cause regarding
5 the issuance of a preliminary injunction and the appointment of a receiver.

6 2. The Court denied the ex parte application for emergency appointment of a
7 receiver and issuance of a temporary restraining order on February 3, 2011.

8 3. On February 28, 2011, a hearing on the Order to Show Cause Re: Appointment
9 of a Receiver and Issuance of a Preliminary Injunction began.

10 4. On March 10, 2011, the Court appointed Mark Adams as provisional receiver for
11 the 26 properties identified in the complaint. Mr. Adams was authorized to investigate
12 alleged violations at the properties and to submit a report to the Court within 30 days of
13 the appointment.

14 5. Respondent filed a notice of appeal of the March 10, 2011 order on March 11,
15 2011.

16 6. On March 21, 2011, respondent posted an undertaking in the amount of \$50,000.
17 Enforcement of the March 10, 2011 order appointing Mr. Adams as provisional receiver
18 was stayed pending appeal.

19 7. The Court issued a ruling granting petitioner's application for appointment of an
20 interim receiver and for issuance of a preliminary injunction as to 6 properties owned by
21 respondents on September 27, 2011. Counsel for petitioner was directed to submit an
22 Order Appointing Receiver and Granting a Preliminary Injunction consistent with the
23 ruling.

24 8. On October 12, 2011, respondents filed an objection to the proposed order
25 submitted by petitioners.

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- 2 -

TENTATIVE RULING

1 9. Respondents Floyd Squires III, Betty J. Squires and several other plaintiffs filed
2 a complaint for trespass and Intentional Invasion of Privacy against Mark Adams,
3 Andrew Adams and California Receivership Group, LLC on October 19, 2011, case
4 number DR110803. The complaint concerns alleged conduct occurring on October 5
5 and October 6, 2011.

6 10. A hearing on respondent's objections to the proposed order was conducted on
7 October 20, 2011. The Court entered an Order Appointing Receiver and Granting
8 Preliminary Injunction on October 24, 2011.

9 11. On October 25, 2011, respondents filed a Notice of Appeal of the October 24,
10 2012 order.

11 12. Respondents were ordered to post an undertaking in the amount of \$50,000
12 pending the appeal of the October 24, 2012 order on October 27, 2011. The October
13 24, 2012 order was stayed pending appeal upon posting of the undertaking on or about
14 November 2, 2011.

15 13. On or about February 7, 2012, the Court of Appeal dismissed the appeal of the
16 March 10, 2011 order as moot.

17 14. The appeal of the October 24, 2012 order has not been decided.

18 **TENTATIVE RULING**

19 The tentative ruling of the Court is as follows:

20 1. The receiver is not entitled to payment from respondents of fees and costs which
21 were incurred prior to Mr. Adams appointment as provisional receiver on March 10,
22 2011. The request for payment of fees and costs incurred prior to appointment by the
23 court as provisional receiver should be directed to the party requesting the services and
24 requiring Mr. Adams attendance at Court hearings.

25 2. The request for fees and costs expended in defense of *Squires v. Adams*,

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TENTATIVE RULING

1 Humboldt County Superior Court case number DR110803, is denied without
2 prejudice.

3 The thrust of the complaint in that matter is that defendants were not duly
4 appointed receivers acting within the scope of their authority as duly appointed receiver
5 when they allegedly intruded upon the subject properties on or about October 5 and
6 October 6, 2011. Until this issue is determined in case number DR110803, the request
7 for fees and costs is denied.

8 3. The request for the following fees and costs is granted:

9 a. Fees and costs expended when performing duties as provisional receiver
10 for the 26 properties identified in complaint between March 10, 2011 (date of
11 appointment) and March 21, 2011 (stay issued pending appeal);

12 b. Fees and costs expended when performing duties as interim receiver for 6
13 properties owned by respondents between October 24, 2011 (order appointing interim
14 receiver entered) and November 2, 2011 (stay issued pending appeal), and

15 c. Premiums for bond for receiver required by the court.

16 The parties are invited to submit points and authorities on any of the issues
17 addressed in the tentative ruling. The opening points and authorities shall be filed on or
18 before September 21, 2012. Responding points and authorities shall be filed on or
19 before October 5, 2012.

20 The Court will issue a final order after receipt and review of the points and
21 authorities.

22
23 Dated: September 4, 2012

DALE A. REINHOLTSEN

24
25 Dale A. Reinholdsen, Judge of the Superior Court

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TENTATIVE RULING

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- 5 -

TENTATIVE RULING

STATE OF CALIFORNIA,)
COUNTY OF HUMBOLDT) SS. AFFIDAVIT OF SERVICE BY MAIL,

I, Lesley M. Amberger SAY:

That I am a citizen of the United States, over 18 years of age, a resident of the County of Humboldt, State of California, and not a party to the within action; that my business address is Humboldt County Courthouse, 825 5th St., Eureka, California, 95501; that I served a true copy of the attached TENTATIVE RULING by placing said copies in the attorney's mail delivery box in the Court Operations Office at Eureka, California on the date indicated below, or by placing said copies in envelope(s) and then placing the envelope(s) for collection and mailing on the date indicated below following our ordinary business practices. I am readily familiar with this business practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service at Eureka, California in a sealed envelope with postage prepaid. These copies were addressed to:

BRADFORD FLOYD, COURT OPS BOX #102

MARK S. ADAMS, 150 SO. BARRINGTON AVE., SUITE 100, LOS ANGELES, CA 90049

Pucci, Dean J. Jones & Mayer, 3777 N Harbor Blvd, Fullerton, CA 92835

Paul Gallagos, c/o Christa McKimmey, Court Ops Box #64

Cyndy Day-Wilson - Eureka City Attorney, Court Ops Box #53

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on the 4th day of August, 2012, at the City of Eureka, County of Humboldt, State of California.

KERRI L. KEENAN, Clerk of the Court

By Lesley M. Amberger
Deputy Clerk

Exhibit 4

FILED

JAN 13 2014

SUPERIOR COURT OF CALIFORNIA
COUNTY OF HUMBOLDT

MARK S. ADAMS, SB#68300
California Receivership Group, L.L.C.
150 S. Barrington Ave., Suite 100
Los Angeles, CA 90049
Court-Appointed Receiver
(310) 471-8181
Fax (310) 471-8180

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF HUMBOLDT

Case No.: DR110040

CITY OF EUREKA, a municipal
corporation, ("the City") and the PEOPLE
OF THE STATE OF CALIFORNIA, ("the
People") by and through Jones & Mayer,
Special Counsel of the City of Eureka,

(PROPOSED) ORDER ON RECEIVER'S
THIRD REPORT

Petitioner,

vs.

FLOYD SQUIRES; FLOYD E. SQUIRES;
FLOYD E. SQUIRES III; BETTY J.
SQUIRES; FB SQUIRES FAMILY
TRUST; BETTY J'S BUILDING, INC; and
DOES ONE through SIXTY.

Respondents.

The Court, having considered the Third Report of the Receiver of Mark Adams
("Receiver") and the exhibits attached thereto, and the Respondent's Objection to the Third
Report, and good cause appearing therefore,

NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

1. The request in the Third Report for fees and costs incurred prior to March 10,
2011 is denied.

2. The request in the Third Report for fees and costs expended in defense of *Squires*
v. Adams, case number DR110803, is denied without prejudice.

1
ORDER ON THIRD RECEIVER'S REPORT

1 3. The requests in the Third Report for the Receiver's costs and fees for work as
2 provisional and interim Receiver are granted for the active appointment period of March 10-21,
3 2011 and October 24-November 2, 2011. The Report's request for costs and fees not for these
4 periods of time is denied.

5 4. The cost of all premiums on the bond required by this Court is granted.

6 5. In compliance with the above findings by the Court, Mark Adams is hereby
7 awarded the above described costs and fees as follows:

8 a. \$8,983.34 for work and costs stemming from the work completed during the
9 period March 10-21, 2011.

10 b. \$3,320.85 for work and costs stemming from the work completed during the
11 period October 24-November 2, 2011.

12 c. \$2,000 for the premiums on the two required receiver bonds.

13 d. \$1,012.81 as reimbursement for advances by the Receiver for costs during the
14 two time periods stated above.

15 6. The total amount due to Receiver of \$15,317 is a joint and several personal
16 obligation of the named Respondents in this matter. Receiver is authorized to collect the full
17 amount of this judgment from Floyd Squires, Floyd E. Squires, Floyd E. Squires III, Betty J.
18 Squires, FB Squires Family Trust, and Betty J's Building, Inc.

19 7. As requested in the Third Report, Receiver is authorized to issue a Receiver's
20 Certificate ("the Certificate") in his official capacity as Receiver with first lien (super priority)
21 status in an amount not to exceed \$15,317 to recover the above listed costs and fees. This
22 Certificate is to be secured by a deed of trust on the properties listed in the appointment order
23 dated March 10, 2011 and the appointment order dated October 24, 2011.

24 8. The Receiver is authorized to sign any Receivership Certificate and
25 accompanying deed of trust with power of sale that he deems complies with the terms of this
26 Order. The Certificate shall be executed in favor of any lender as may willing to finance such a
27 Receiver's Certificate on such terms as are commercially reasonable and acceptable to the
28 Receiver and as are subsequently reported to the Court.

1 9. The sums due under the Certificate shall be due and payable at such time as the
2 Receiver and the lender shall agree and subsequently report to the Court but in no case later than
3 the date on which the Court approves the Receiver's final accounting and the Receiver is
4 discharged.

5 10. The Certificate and Deed of Trust shall be a lien with priority over any and all
6 existing liens or encumbrances (including the existing first trust deed on the property) other than
7 any lien recorded by a governmental entity for taxes on the property. The Certificate, the
8 accompanying Deed of Trust and this Order shall be recorded with the Office of the Humboldt
9 County Recorder.

10
11 IT IS SO ORDERED.

12
13 DATED: JAN 09 2014, 2013

DALE A. REINHOLTSSEN
Judge of the Superior Court

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ORDER ON THIRD RECEIVER'S REPORT

Exhibit 5

FILED

SEP 18 2013 *ML*

SUPERIOR COURT OF CALIFORNIA
COUNTY OF HUMBOLDT

SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT

CITY OF EUREKA and THE PEOPLE
OF THE STATE OF CALIFORNIA,

CASE NO. DR110040

RULING

Plaintiffs,

vs.

FLOYD SQUIRES and BETTY
SQUIRES, et al.,

Defendants.

Presently before the Court is the Third Receiver's Report and Declaration of Mark Adams Re Interim Fees Request and Request for Lien on Real Property to Secure Payment Thereof. The Third Receiver's Report is opposed by respondents, who filed an opposition to Third Receiver's Report. The Court has considered the papers submitted in support and opposition to the Third Receiver's Report. In light of the materials submitted, the Court rules as follows:¹

¹ Petitioners are referred to herein collectively as "City," and the respondents are referred to herein collectively as "Squires."

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- 1 -

RULING

1 DISCUSSION

2
3 Procedural History

4 The procedural history in this matter relevant to the issues before the Court is as
5 follows:

6 1. On January 18, 2011, City filed a complaint alleging substandard and unsafe
7 conditions at 26 properties owned by Squires. Among other remedies, City sought 1)
8 an emergency appointment of a receiver for the properties and a temporary restraining
9 order, and 2) an order to show cause regarding the issuance of a preliminary injunction
10 and the appointment of a receiver.

11 2. The ex parte application for emergency appointment of a receiver and
12 issuance of a temporary restraining order was denied on February 3, 2011.

13 3. On February 28, 2011, a hearing on the Order to Show Cause Re:
14 Appointment of a Receiver and Issuance of a Preliminary Injunction commenced.

15 4. The Court appointed Mark Adams as provisional receiver for the 26 properties
16 identified in the complaint on March 10, 2011. Mr. Adams was directed to investigate
17 alleged violations at the properties, and submit a report to the Court within 30 days of
18 appointment.

19 5. Squires filed a notice of appeal of the order appointing Mr. Adams on March
20 11, 2011, and posted on an undertaking in the amount of \$50,000 on March 21, 2011.
21 Enforcement of the order appointing the provisional receiver was stayed pending
22 appeal.

23 The Court of Appeal dismissed the appeal of the March 10, 2011 order as moot
24 on February 7, 2012.

25 6. The hearing on the Order to Show Cause Re: Appointment of a Receiver and

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- 2 -

RULING

1 issuance of a Preliminary Injunction concluded on June 13, 2011. The Court issued a
2 ruling granting City's application for appointment of an interim receiver and for issuance
3 of a preliminary injunction as to six properties owned by Squires on September 27,
4 2011.

5 Counsel for City was directed to submit an order consistent with the ruling.

6 7. On October 12, 2011, Squires filed an objection to the proposed order
7 submitted by the City.

8 8. On October 19, 2011, Floyd Squires III, Betty J. Squires and additional
9 plaintiffs filed a complaint for trespass and intentional invasion of privacy against Mark
10 Adams, Andrew Adams and California Receivership Group, LLC, case number
11 DR110803. The complaint concerns alleged conduct occurring on October 5 and
12 October 6, 2011 on one or more of the six properties owned by Squires.

13 9. On October 20, 2011, a hearing was conducted on Squire's objections to the
14 proposed order submitted by the City. The Court entered an Order Appointing Receiver
15 and Granting Preliminary Injunction on October 24, 2011.

16 10. On October 25, 2011, Squires filed a Notice of Appeal of the October 24,
17 2011 order. Squires was ordered to post an undertaking pending the appeal, an
18 undertaking in the amount of \$50,000 was posted and the October 24, 2011 Order was
19 stayed pending appeal on or about November 2, 2011.

20 11. The trial on City's complaint seeking issuance of a permanent injunction,
21 declaratory relief, civil penalties and the appointment of a receiver because of alleged
22 nuisances and other substandard conditions at the 26 properties owned by Squires
23 commenced on October 8, 2012.

24 12. An Interim Ruling entered July 2, 2013. The Court found as follows:

25 a. The evidence did not support a finding that the subject properties were

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- 3 -

RULING

1 presently maintained in such a manner as to come within the provisions of Health
2 and Safety Code sections 17980.6 and 17980.7;

3 b. The evidence presented concerning the current condition of the subject
4 properties did not support a finding that any of the subject properties constituted
5 a public nuisance as defined by Civil Code sections 3479 and 3480 or Eureka
6 Municipal Code sections 150.162 or 150.163; and

7 c. The evidence supported a finding that the violations of the Applicable codes
8 and local ordinances at the subject properties constituted violations of Business
9 and Professions Code section 17200 et. seq.

10 The Court further ordered that a receiver be appointed pursuant to Business and
11 Professions Code section 17203 to 1) inspect the 26 properties in conjunction with City
12 Building Department officials and 2) report to the Court concerning the current condition
13 of the properties. City and Squires were directed to submit nominations for the receiver.

14 Analysis

15 California Rules of Court, Rule 3.1181 provides that the receiver is the agent of
16 the Court and not of any party.

17 The City filed an ex parte application for emergency appointment of a receiver
18 and issuance of a temporary restraining order on January 18, 2011. The ex parte
19 application was denied on February 3, 2011. Mr. Adams' work on the case at this stage
20 of the proceedings would appear to be at the behest of the City; he was not acting as an
21 agent of the Court.

22 The Court initially appointed Mr. Adams as its agent in this matter on March 10,
23 2011. Mr. Adams was authorized to investigate alleged violations at the 26 properties,
24 and submit a report to the Court within 30 days. Enforcement of the order appointing
25

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1 the provisional receiver was stayed pending appeal on March 21, 2011.²

2 Thereafter, the Court appointed Mr. Adams as its agent pursuant to an Order
3 Appointing Receiver and Granting Preliminary Injunction entered October 24, 2011.

4 The order appointed Mr. Adams as receiver for the receivership properties [6 of the 26
5 properties] and granted certain powers pursuant to Health and Safety Code section
6 17980.7(c). Squires filed a Notice of Appeal of the October 24, 2011 order, posted an
7 undertaking pending the appeal, and the order was stayed pending appeal on or about
8 November 2, 2011.³

9 Finally, in the case of *Squires v. Adams*, Humboldt County Superior Court case
10 number DR110803, Floyd Squires III, Betty J. Squires and additional plaintiffs, filed a
11 complaint for trespass and intentional invasion of privacy against Mark Adams, Andrew
12 Adams and California Receivership Group, LLC. The complaint alleged conduct
13 occurring on one or more of the properties owned by Squires on October 5 and October
14 6, 2011.

15 The alleged conduct would have occurred after the enforcement of the March 10,
16 2011 order appointing Mr. Adams provisional receiver was stayed pending appeal, and
17 before the order entered on October 24, 2011 appointing Mr. Adams as a receiver and
18 granting a preliminary injunction.

19 RULING

20 Based on the foregoing, the Court rules as follows:

21 1. The receiver is not entitled to payment from Squires of fees and costs which
22
23

24 ² The Court of Appeal dismissed the appeal of the March 10, 2011 order as moot on February 7, 2012.

25 ³ The appeal appears to be currently pending. In the Interim Ruling entered July 2, 2013, however, the Court found that the subject properties were not presently maintained in such a manner as to come within the provisions of sections 17980.6 and 17980.7 of the Health and Safety Code.

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RULING

1 were incurred prior to Mr. Adams appointment by the Court as its agent as provisional
2 receiver on March 10, 2011. The request for fees and costs incurred prior to
3 appointment as the Court's agent should be directed to the party requesting the
4 services and requiring Mr. Adams attendance at Court hearings.

5 2. The request for fees and costs expended in defense of *Squires v. Adams*,
6 case number DR110803, is denied without prejudice.

7 Plaintiffs allege in that matter that defendants were not acting within the scope of
8 their authority as duly appointed receiver when they engaged in the conduct alleged to
9 have occurred on October 5 and October 6, 2011. Until this issue is determined, the
10 request for fees and costs is denied without prejudice.

11 3. The request for the following fees and costs is granted:

12 a. Fees and costs expended when performing duties as provisional receiver for
13 the 26 properties identified in the complaint between March 10, 2011 and March
14 21, 2011;

15 b. Fees and costs expended when performing duties as interim receiver for six
16 properties owned by Squires between October 24, 2011 and November 2, 2011;
17 and

18 c. Premiums for bond for receiver required by the Court.

19 The Receiver shall submit an order consistent with this ruling, approved as to
20 form by counsel for Squires, for signature by the Court.

21 Dated: September 13, 2013

DALE A. REINHOLTS

Dale A. Reinholtsen, Judge of the Superior Court

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STATE OF CALIFORNIA,)
COUNTY OF HUMBOLDT | SS. AFFIDAVIT OF SERVICE BY MAIL

I, Susan C. Edwards, say:

That I am a citizen of the United States, over 18 years of age, a resident of the County of Humboldt, State of California, and not a party to the within action; that my business address is 825 5th Street, Humboldt County Courthouse, Eureka, California, 95501; that I served a true copy of the attached RULING by placing said copies in the attorney's mail delivery box in the Court Operations Office at Eureka, California on the date indicated below, or by placing said copies in envelope(s) and then placing the envelope(s) for collection and mailing on the date indicated below following our ordinary business practices. I am readily familiar with this business practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service at Eureka, California in a sealed envelope with postage prepaid. These copies were addressed to:

Dean Pucci, Jones and Mayer, 3777 N. Harbor Blvd., Fullerton, CA 92835

Krista MacNevin Jee, Jones and Mayer, 3777 N. Harbor Blvd., Fullerton, CA 92835

Bradford Floyd, Court Operations Box #102

California Receivership Group, LLC, 150 So. Barrington Ave., #100,
Los Angeles, CA 90049

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on the 10 day of September, 2013, at the City of Eureka, County of Humboldt, State of California.

KERRI L. KEENAN, Clerk of the Court

By Susan C. Edwards
Deputy Clerk

Exhibit 6

California Receivership Group, LLC
Sales by Item Summary
April 2011 through August 2016

	Apr 11	May 11	Jun 11	Jul 11	Aug 11	Sep 11	Oct 11	Nov 11	Dec 11
	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>
Service									
Andrew Adams	0.00	0.00	0.00	2,250.00	0.00	0.00	482.50	4,412.50	2,675.00
Eddie Gao	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Erica Connolly	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Marcy Wehde	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mark Adams	21,825.00	0.00	175.00	0.00	0.00	0.00	0.00	3,659.34	3,325.01
Natalie Delgadillo	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tyler Huxtable	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sally Rowshan	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	<u>21,825.00</u>	<u>0.00</u>	<u>175.00</u>	<u>2,250.00</u>	<u>0.00</u>	<u>0.00</u>	<u>482.50</u>	<u>7,870.84</u>	<u>6,000.01</u>

Service
Andrew Adams
Eddie Gao
Erica Connolly
Marcy Wehde
Mark Adams
Natalie Delgadillo
Tyler Huxtable
Sally Rowshan
TOTAL

California Receivership Group, LLC
Sales by Item Summary
April 2011 through August 2018

	<u>Jan 12</u>	<u>Feb 12</u>	<u>Mar 12</u>	<u>Apr 12</u>	<u>May 12</u>	<u>Jun 12</u>	<u>Jul 12</u>	<u>Aug 12</u>	<u>Sep 12</u>	<u>Oct 12</u>	<u>Nov 12</u>	<u>Dec 12</u>
	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>
Service												
Andrew Adams	2,487.50	3,187.50	7,887.50	1,037.50	1,500.00	1,925.00	2,827.50	1,875.00	337.50	475.00	0.00	0.00
Edile Gao	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Erica Connolly	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Marcy Wehde	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mark Adams	1,400.00	3,570.02	3,383.18	933.34	281.87	2,218.87	525.00	891.89	1,108.34	2,041.57	1,108.34	118.87
Natalie Delgadillo	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tyler Huxtable	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sally Rowshan	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	3,887.50	8,757.52	11,060.68	1,970.84	1,781.87	4,143.87	3,352.50	2,866.89	1,445.84	2,516.57	1,108.34	118.87

	<u>Jan 13</u>	<u>Feb 13</u>	<u>Mar 13</u>	<u>Apr 13</u>	<u>May 13</u>	<u>Jun 13</u>	<u>Jul 13</u>	<u>Aug 13</u>	<u>Sep 13</u>	<u>Oct 13</u>	<u>Nov 13</u>	<u>Dec 13</u>
	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>
Service												
Andrew Adams	0.00	0.00	125.00	1,400.00	833.33	1,450.00	2,868.55	150.00	0.00	1,733.34	100.00	218.88
Edile Gao	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Erica Connolly	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Marcy Wehde	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mark Adams	0.00	291.87	233.34	1,050.00	233.34	1,518.87	2,333.34	875.00	118.87	1,283.35	350.01	233.34
Natalie Delgadillo	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tyler Huxtable	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sally Rowshan	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	0.00	291.87	358.34	2,450.00	1,066.67	2,968.87	4,999.99	1,025.00	118.87	3,016.69	450.01	450.00

California Receivership Group, LLC
Sales by Item Summary
April 2011 through August 2016

	<u>Jan 14</u>	<u>Feb 14</u>	<u>Mar 14</u>	<u>Apr 14</u>	<u>May 14</u>	<u>Jun 14</u>	<u>Jul 14</u>	<u>Aug 14</u>	<u>Sep 14</u>	<u>Oct 14</u>	<u>Nov 14</u>	<u>Dec 14</u>
	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>
Service												
Andrew Adams	388.68	268.67	2,766.68	280.66	0.00	1,249.99	750.00	0.00	0.00	0.00	0.00	0.00
Eddie Geo	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Erica Connolly	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Marcy Wehde	0.00	0.00	0.00	0.00	20.00	370.00	80.00	10.00	20.00	10.00	40.00	0.00
Mark Adams	350.01	5,878.34	1,190.00	980.00	385.00	2,345.00	1,980.00	105.00	70.00	280.00	105.00	70.00
Natalie Delgadillo	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tyler Huxtable	0.00	0.00	0.00	0.00	42.50	472.50	135.00	30.00	15.00	15.00	30.00	22.50
Sally Rowshan	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	30.00	0.00
TOTAL	718.67	6,146.01	3,956.68	1,260.66	447.50	4,437.49	2,865.00	145.00	100.00	305.00	205.00	92.50

	<u>Jan 15</u>	<u>Feb 15</u>	<u>Mar 15</u>	<u>Apr 15</u>	<u>May 15</u>	<u>Jun 15</u>	<u>Jul 15</u>	<u>Aug 15</u>	<u>Sep 15</u>	<u>Oct 15</u>	<u>Nov 15</u>	<u>Dec 15</u>
	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>
Service												
Andrew Adams	150.00	2,300.00	50.00	650.00	800.00	400.00	300.00	0.00	300.00	0.00	0.00	0.00
Eddie Geo	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Erica Connolly	0.00	0.00	0.00	0.00	0.00	32.00	40.00	0.00	0.00	0.00	0.00	0.00
Marcy Wehde	0.00	0.00	0.00	0.00	0.00	0.00	20.00	0.00	0.00	0.00	0.00	0.00
Mark Adams	105.00	735.00	315.00	2,240.00	1,796.87	315.00	875.00	105.00	105.00	105.00	0.00	105.00
Natalie Delgadillo	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13.00	0.00
Tyler Huxtable	15.00	60.00	82.50	30.00	90.00	50.00	50.00	20.00	10.00	10.00	60.00	30.00
Sally Rowshan	60.00	60.00	30.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	330.00	3,155.00	477.50	2,920.00	2,686.87	797.00	1,285.00	125.00	415.00	115.00	73.00	135.00

California Receivership Group, LLC
Sales by Item Summary
April 2011 through August 2016

	Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15
	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount
Service								
Andrew Adams	0.00	0.00	0.00	0.00	80.00	0.00	100.00	15,250.00
Edith Gao	0.00	0.00	0.00	0.00	208.00	0.00	0.00	0.00
Erica Connolly	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Marcy Wehde	0.00	0.00	0.00	0.00	15.00	0.00	0.00	0.00
Mark Adams	0.00	0.00	0.00	0.00	140.00	70.00	0.00	1,330.00
Natalie Delgadillo	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tyler Huxtable	0.00	0.00	0.00	0.00	15.00	0.00	0.00	195.00
Sally Rowshan	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	0.00	0.00	0.00	0.00	428.00	70.00	100.00	16,775.00

	2011	2012	2013	2014	2015	2016	Total
	Amount	Amount	Amount	Amount	Amount	Amount	Amount
Service							
Andrew Adams	9,800.00	23,320.00	8,874.98	5,888.86	4,860.00	15,400.00	67,811.04
Edith Gao	0.00	0.00	0.00	0.00	0.00	208.00	208.00
Erica Connolly	0.00	0.00	0.00	0.00	72.00	0.00	72.00
Marcy Wehde	0.00	0.00	0.00	530.00	20.00	15.00	565.00
Mark Adams	28,983.35	17,888.75	6,516.73	18,718.35	8,801.87	1,540.00	80,246.85
Natalie Delgadillo	0.00	0.00	0.00	0.00	13.00	0.00	13.00
Tyler Huxtable	0.00	0.00	0.00	762.50	537.50	210.00	1,510.00
Sally Rowshan	0.00	0.00	0.00	30.00	150.00	0.00	180.00
TOTAL	38,783.35	41,006.75	17,181.71	23,707.61	12,844.17	17,373.00	160,606.49



CALIFORNIA RECEIVERSHIP GROUP, LLC

Invoice

2716 Ocean Park Blvd.
Suite 3010

310-471-8181

www.calreceivers.com

Invoice #: 1659

Invoice Date: 4/1/2011

Due Date: 4/1/2011

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
9/9/2010	ZLegal Fees	draft litigation memorandum	2	350.00	700.00
9/10/2010	ZLegal Fees	edit litigation memorandum	1.33333	350.00	466.67
1/18/2011	ZLegal Fees	Travel to Eureka for court hearing	4	350.00	1,400.00
1/19/2011	ZLegal Fees	Court hearing	3	350.00	1,050.00
1/19/2011	ZLegal Fees	F/U to Court hearing	2	350.00	700.00
1/20/2011	ZLegal Fees	Travel to LA after hearing	5	350.00	1,750.00
1/25/2011	ZLegal Fees	Travel to Eureka	3.5	350.00	1,225.00
1/25/2011	ZLegal Fees	Court hearing RE appointment	3	350.00	1,050.00
1/26/2011	ZLegal Fees	Scott Pesch meeting	1.5	350.00	525.00
1/26/2011	ZLegal Fees	Brian Gerveng meeting	1.5	350.00	525.00
1/26/2011	ZLegal Fees	Return travel	3.5	350.00	1,225.00
1/26/2011	ZLegal Fees	F/U to trip	1	350.00	350.00
2/4/2011	ZLegal Fees	T/C reporter	0.66667	350.00	233.33
2/12/2011	ZLegal Fees	Draft Declaration RE qualifications	0.66667	350.00	233.33
2/26/2011	ZLegal Fees	T/C with Dean; trial preparation	0.66667	350.00	233.33
2/27/2011	Mark Adams	Travel	3	350.00	1,050.00
2/28/2011	ZLegal Fees	Court hearing	3	350.00	1,050.00
3/2/2011	Mark Adams	Court hearing	4	350.00	1,400.00
3/2/2011	Mark Adams	Travel to LA	2	350.00	700.00
3/8/2011	Mark Adams	Telephone call with Dean Puoti	0.66667	350.00	233.33
3/8/2011	Mark Adams	Trip planning	0.83333	350.00	291.67
3/8/2011	Mark Adams	Travel to Eureka	2	350.00	700.00
3/9/2011	Mark Adams	Attend court hearing	2	350.00	700.00
3/10/2011	Mark Adams	Hearing and file	3	350.00	1,050.00
3/11/2011	Mark Adams	Return from Eureka	4	350.00	1,400.00
3/14/2011	Mark Adams	Follow up RE Ex Parte and Inspections	1.5	350.00	525.00
3/15/2011	Mark Adams	Travel for court hearing	4	350.00	1,400.00
3/15/2011	Mark Adams	Meeting with inspection crew	1.5	350.00	525.00
3/15/2011	Mark Adams	Meeting with inspection crew	0.83333	350.00	291.67
3/15/2011	Mark Adams	Ex Parte court hearing	0.83333	350.00	291.67
3/15/2011	Mark Adams	Meeting with inspection crew	1	350.00	350.00
3/16/2011	Mark Adams	Court hearing; file to Stay of Receivership	2.6	350.00	910.00
3/16/2011	Mark Adams	Return travel to LA	5	350.00	1,750.00
3/21/2011	Mark Adams	F/U RE posting bond	1.5	350.00	525.00
6/3/2011	Mark Adams	T/C Dean Puoti	0.5	350.00	175.00
6/7/2011	Mark Adams	Review financial statements	0.5	350.00	175.00

Total \$27,125.00

Payments/Credits -\$5,200.00

Balance Due \$21,925.00



CALIFORNIA
RECEIVERSHIP
GROUP, LLC

2718 Ocean Park Blvd.
Suite 3010

310-471-8181
www.calreceivers.com

Invoice

Invoice #: 1709

Invoice Date: 6/1/2011

Due Date: 6/1/2011

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
5/5/2011	Legal Fees/MAKLE	T/C with attorney for lender and flu	0.5	\$350.00	\$175.00
Total					\$175.00
Payments/Credits					\$0.00
Balance Due					\$175.00



CALIFORNIA RECEIVERSHIP GROUP, LLC

2716 Ocean Park Blvd.
Suite 3010

310-471-8181

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Invoice

Invoice #: 1805

Invoice Date: 7/8/2011

Due Date: 7/8/2011

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
1/25/2011	ZServices	Travel to Eureka, hearing and debriefing with City staffers and attorneys	7	100.00	700.00
1/26/2011	ZServices	Pick up documents from city; discussion with city officials RE properties and approach to surveying, assessing; meeting with broker.	2	100.00	200.00
1/27/2011	ZServices	Survey, photograph and take notes on all Squires properties	5.5	100.00	550.00
1/27/2011	ZServices	Recording and database entry of photos; review city documents; import info and create excel spreadsheet	2	100.00	200.00
1/28/2011	ZServices	Begin input from prelims on amount owed on each property; determine total amount of existing liens on each property.	1.25	100.00	125.00
1/31/2011	ZServices	Work through Eureka city documents, assign data to each loan for estimation on total amount owed; add broker price opinions and rental info to spreadsheet in order to prepare spreadsheet that assigns debt to value ratio.	3.25	100.00	325.00
6/5/2011	ZAndrew Adams	Prepare Mark for potential testimony	1	150.00	150.00
Total					\$2,250.00
Payments/Credits					\$0.00
Balance Due					\$2,250.00



CALIFORNIA
RECEIVERSHIP
GROUP, LLC

2718 Ocean Park Blvd.
Suite 3010

910-471-8181

www.calreceivers.com

Invoice

Invoice #: 1874

Invoice Date: 10/1/2011

Due Date: 10/1/2011

Terms: Due on receipt

BNI To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
9/29/2011	ZAndrew Adams	Review order, prepare action	0.75	150.00	112.50
9/30/2011	ZAndrew Adams	Conference Call and prepare for property inspections	2.33333	150.00	350.00
Total					\$462.50
Payments/Credits					\$0.00
Balance Due					\$462.50



CALIFORNIA RECEIVERSHIP GROUP, LLC

2716 Ocean Park Blvd.
Suite 3010

310-471-6181

www.calreceivers.com

Invoice

Invoice #: 2032

Invoice Date: 11/1/2011

Due Date: 11/1/2011

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
10/4/2011	Mark Adams	Plan inspection trip for Andrew	0.5	350.00	175.00
10/4/2011	Mark Adams	organize property inspection trip	0.66667	350.00	233.33
10/6/2011	Mark Adams	Misc T/C RE Property inspection	0.5	350.00	175.00
10/6/2011	Mark Adams	T/C AA RE Brad Floyd and FAU	0.5	350.00	175.00
10/13/2011	Mark Adams	Review pleadings	0.5	350.00	175.00
10/20/2011	Mark Adams	Prepare for court call hearing	2	350.00	700.00
10/24/2011	Mark Adams	Staff discussion RE lawsuit filed	0.33333	350.00	116.67
10/25/2011	Mark Adams	FAU RE application order, Meeting with AA	0.33333	350.00	116.67
10/25/2011	Mark Adams	Review and edit 1st Receiver's Report	0.5	350.00	175.00
10/26/2011	Mark Adams	Prepare for property management call. w/ Ted and FAU	1.16667	350.00	408.33
10/26/2011	Mark Adams	Review, edit and approve First Receiver's Report	0.83333	350.00	291.67
10/28/2011	Mark Adams	FAU RE posting of appellate bond	1	350.00	350.00
10/31/2011	Mark Adams	Staff discussion and case planning	0.33333	350.00	116.67
	Mark Adams	Prepare for and conference call with City	1	350.00	350.00
Total					\$3,558.34
Payments/Credits					\$0.00
Balance Due					\$3,558.34



CALIFORNIA RECEIVERSHIP GROUP, LLC

2716 Ocean Park Blvd.
Suite 3010

310-471-8181

www.calreceivers.com

Invoice

Invoice #: 1681

Invoice Date: 11/8/2011

Due Date: 11/8/2011

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
10/3/2011	ZAndrew Adams	Travel and implementation of plans	0.5	150.00	75.00
10/5/2011	ZAndrew Adams	Travel	1.5	150.00	225.00
10/5/2011	ZAndrew Adams	Travel	5.08333	150.00	762.50
10/5/2011	ZAndrew Adams	Prepare letter for inspections, and schedule inspections	1.41667	150.00	212.50
10/3/2011	ZAndrew Adams	Meet with Brian Garving, prepare Notice and Ruling, attach to properties, discussions with residents/tenants; preliminary property inspections.	3.5	150.00	525.00
10/5/2011	ZAndrew Adams	Responds to emails on Eureka; update city with completed work.	0.75	150.00	112.50
10/6/2011	ZAndrew Adams	Prep travel plans for the day, discuss inspection plan, talk with Brad Floyd RE meeting; arrange inspection meeting with Ralph Brady.	1	150.00	150.00
10/5/2011	ZAndrew Adams	Meet with Professional Consolidated Property Management	1	150.00	150.00
10/5/2011	ZAndrew Adams	Tour all properties, take photos	2	150.00	300.00
10/5/2011	ZAndrew Adams	Meet with Ralph Brady RE inspections	1	150.00	150.00
10/5/2011	ZAndrew Adams	Meet with Brad Floyd to determine inspections and rent; update Brian Garving.	1.5	150.00	225.00
10/11/2011	ZAndrew Adams	Order review, act.	0.5	150.00	75.00
10/11/2011	ZAndrew Adams	Order review, act.	0.16667	150.00	25.00
10/12/2011	ZAndrew Adams	Review property management contract	0.33333	150.00	50.00
10/4/2011	ZAndrew Adams	Prepare for trip and inspections.	1.16667	150.00	175.00
10/18/2011	ZAndrew Adams	Read complaint	0.25	150.00	37.50
10/25/2011	ZAndrew Adams	Read order and notify contractor and property management team	0.25	150.00	37.50
10/28/2011	ZAndrew Adams	Prepare report for court RE appointment	1.41667	150.00	212.50
10/25/2011	ZAndrew Adams	1st Receiver's Report	0.75	150.00	112.50
10/25/2011	ZAndrew Adams	Reply to Gil's Opposition	0.81667	150.00	122.50
10/25/2011	ZAndrew Adams	Property management contract, prepare for inspection	2.41667	150.00	362.50
10/28/2011	ZAndrew Adams	Work on 1st Receiver's Report and Request for Funds	0.81667	150.00	122.50
10/28/2011	ZAndrew Adams	Send letter to residents, contract property management company	0.5	150.00	75.00
10/31/2011	ZAndrew Adams	Review lawsuit	0.33333	150.00	50.00
10/31/2011	ZAndrew Adams	Research bond issues	0.25	150.00	37.50

Total \$4,412.50

Payments/Credits \$0.00

Balance Due \$4,412.50



CALIFORNIA
RECEIVERSHIP
GROUP, LLC

2716 Ocean Park Blvd.
Suite 3010

310-471-8181

www.calreceivers.com

Invoice

Invoice #: 1930

Invoice Date: 12/1/2011

Due Date: 12/1/2011

Terms: Due on receipt

BILL To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
11/2/2011	Mark Adams	T/C with Brad Floyd and F/U RE bond posting	0.33333	350.00	116.67
11/2/2011	Mark Adams	Misc. T/C and emails RE real collection	0.63333	350.00	221.67
11/2/2011	Mark Adams	F/U RE posting appellate bond	0.33333	350.00	116.67
11/2/2011	Mark Adams	T/C tenants RE who to pay rent to	0.16667	350.00	58.33
11/3/2011	Mark Adams	Redraft Floyd letter RE litigation	0.5	350.00	175.00
11/3/2011	Mark Adams	F/U to Brad Floyd email	0.8	350.00	280.00
11/7/2011	Mark Adams	Staff discussion RE operating issues	0.33333	350.00	116.67
11/14/2011	Mark Adams	Legal strategy session RE Squires	1.16667	350.00	408.33
11/18/2011	Mark Adams	LACLL for research RE lawsuit	2	350.00	700.00
11/28/2011	Mark Adams	Staff discussion RE pending issues	0.63333	350.00	221.67
11/30/2011	Mark Adams	Review / edit Demurrer	1.5	350.00	525.00
11/30/2011	Mark Adams	Edit Demurrer	1	350.00	350.00
Total					\$3,325.01
Payments/Credits					\$0.00
Balance Due					\$3,325.01



CALIFORNIA
RECEIVERSHIP
GROUP, LLC

2716 Ocean Park Blvd.
Suite 3010

310-471-8181

www.calreceivers.com

Invoice

Invoice #: 1868

Invoice Date: 12/8/2011

Due Date: 12/8/2011

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
11/3/2011	ZAndrew Adams	Letter to Brad Floyd, email to PPM	0.33333	150.00	50.00
11/9/2011	ZAndrew Adams	Research on receivership during stay	0.33333	150.00	50.00
11/15/2011	ZAndrew Adams	Research RE stay	0.58333	150.00	87.50
11/15/2011	ZAndrew Adams	Research RE Stay	2.91667	150.00	437.50
11/16/2011	ZAndrew Adams	Research response to trespass	0.91667	150.00	137.50
11/16/2011	ZAndrew Adams	Continue research and develop response to trespass claims	1	150.00	150.00
11/22/2011	ZAndrew Adams	Prepare Demurrer	6.5	150.00	975.00
11/29/2011	ZAndrew Adams	Research on stay	1.41667	150.00	212.50
11/30/2011	ZAndrew Adams	Review demurrer	3.83333	150.00	575.00
Total					\$2,675.00
Payments/Credits					\$0.00
Balance Due					\$2,675.00



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Invoice #: 2026

Invoice Date: 1/1/2012

Due Date: 1/1/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
12/1/2011	Mark Adams	Coordinate filing of Demurrer	0.88867	350.00	233.33
12/6/2011	Mark Adams	Staff discussion RE litigation	0.33333	350.00	116.67
12/12/2011	Mark Adams	Court call and hearing	1	350.00	350.00
12/20/2011	Mark Adams	Staff discussion RE pending issues	0.5	350.00	175.00
12/21/2011	Mark Adams	Review and comment on SLAPP Motion	1.5	350.00	525.00
Total					\$1,400.00
Payments/Credits					\$0.00
Balance Due					\$1,400.00



CALIFORNIA
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2718 Ocean Park Blvd.
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Invoice #: 2027

Invoice Date: 1/8/2012

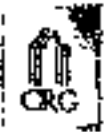
Due Date: 1/8/2012

Terms: Due on receipt

Billed To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
12/5/2011	ZAndrew Adams	Supplement to First Receiver's Report	0.83333	150.00	125.00
12/8/2011	ZAndrew Adams	Anti-SLAPP	1.91667	150.00	287.50
12/8/2011	ZAndrew Adams	Research for Anti-SLAPP Motion	5	150.00	750.00
12/9/2011	ZAndrew Adams	Prepare Anti SLAPP	3.6	150.00	525.00
12/8/2011	ZAndrew Adams	Anti - SLAPP	4.83333	150.00	725.00
12/28/2011	ZAndrew Adams	Research into appellate process	0.5	150.00	75.00
Total					\$2,487.50
Payments/Credits					\$0.00
Balance Due					\$2,487.50



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Invoice

Invoice #: 2028

Invoice Date: 2/1/2012

Due Date: 2/1/2012

Terms: Due on receipt

BHI To:

Squires 20, Eureka

Date	Service	Description	Hours	Rate	Amount
1/3/2012	Mark Adams	Staff discussion RE litigation issues	0.2	350.00	70.00
1/4/2012	Mark Adams	Review appellate briefs	0.5	350.00	175.00
1/5/2012	Mark Adams	Hearing preparation, court call appearance	1.33333	350.00	466.67
1/6/2012	Mark Adams	F/U Research to Demurrer hearing	0.83333	350.00	291.67
1/8/2012	Mark Adams	Staff meeting RE litigation	0.5	350.00	175.00
1/10/2012	Mark Adams	Review and edit Demurrer	1.66667	350.00	583.33
1/13/2012	Mark Adams	edit Demurrer	1.33333	350.00	466.67
1/18/2012	Mark Adams	AA Discussion RE Demurrer	0.33333	350.00	116.67
1/18/2012	Mark Adams	Edit Demurrer	1.33333	350.00	466.67
1/19/2012	Mark Adams	Edit and approve Demurrer	0.5	350.00	175.00
1/23/2012	Mark Adams	Staff discussion RE litigation	0.33333	350.00	116.67
1/25/2012	Mark Adams	Meeting RE response to scheduling order	0.83333	350.00	291.67
1/31/2012	Mark Adams	Staff discussion RE litigation	0.5	350.00	175.00
Total					\$3,570.02
Payments/Credits					\$0.00
Balance Due					\$3,570.02



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Invoice

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Invoice #: 2029

Invoice Date: 2/4/2012

Due Date: 2/4/2012

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
1/3/2012	ZAndrew Adams	Prepare for Demurrer hearing	0.75	150.00	112.50
1/5/2012	ZAndrew Adams	Demurrer Preparation	1.41667	150.00	212.50
1/5/2012	ZAndrew Adams	Demurrer Preparation	3.33333	150.00	500.00
1/6/2012	ZAndrew Adams	Amend Complaint / Demurrer	2.5	150.00	375.00
1/8/2012	ZAndrew Adams	Amended Demurrer	2.81667	150.00	437.50
1/8/2012	ZAndrew Adams	Amended Demurrer	3.25	150.00	487.50
1/10/2012	ZAndrew Adams	Amended Demurrer	1.16667	150.00	175.00
1/12/2012	ZAndrew Adams	Demurrer Review	2.41667	150.00	362.50
1/16/2012	ZAndrew Adams	Demurrer Review	0.66667	150.00	100.00
1/16/2012	ZAndrew Adams	Demurrer Finalization	0.5	150.00	75.00
1/24/2012	ZAndrew Adams	Prepare response for scheduling order	0.33333	150.00	50.00
1/31/2012	ZAndrew Adams	Bond report, 2nd Receiver's Report	1.33333	150.00	200.00
1/31/2012	ZAndrew Adams	Contact court, prep stipulation	0.66667	150.00	100.00
Total					\$3,187.50
Payments/Credits					\$0.00
Balance Due					\$3,187.50



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Invoice

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Invoice #: 2031

Invoice Date: 3/1/2012

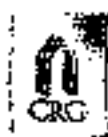
Due Date: 3/1/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
2/3/2012	Mark Adams	to lender attorney and fu re case status	0.33333	350.00	116.67
2/6/2012	Mark Adams	review email and approve case management conference statement in Squires case.	0.33333	350.00	116.67
2/8/2012	Mark Adams	staff discussion and fu re bond and litigation matters	0.33333	350.00	116.67
2/10/2012	Mark Adams	meeting with AA re demurrer and reply	0.66667	350.00	233.33
2/11/2012	Mark Adams	review and edit reply to opposition to our demurrer	1.5	350.00	525.00
2/13/2012	Mark Adams	meeting AA re demurrer drafting	0.66667	350.00	233.33
2/15/2012	Mark Adams	to counsel re court's scheduling order	0.5	350.00	175.00
2/16/2012	Mark Adams	edit reply to scheduling order memo of equities	0.33333	350.00	116.67
2/16/2012	Mark Adams	review and edit objection to judicial notice pleading	0.33333	350.00	116.67
2/16/2012	Mark Adams	staff discussion re litigation and King receiver declaration with court	0.66667	350.00	233.33
2/17/2012	Mark Adams	meeting AA re hearing strategy for demurrer	0.5	350.00	175.00
2/20/2012	Mark Adams	review and edit declaration and report re fees	1	350.00	350.00
2/20/2012	Mark Adams	arrange exhibits for AA declaration	0.33333	350.00	116.67
2/20/2012	Mark Adams	finish declaration, hearing prep with AA	0.5	350.00	175.00
2/22/2012	Mark Adams	hearing prep and hearing re demurrer, status conference and 2nd receiver report, hearing fu	0.83333	350.00	291.67
2/22/2012	Mark Adams	Review Points and Authorities RE scheduling order	0.83333	350.00	291.67
Total					\$3,383.35
Payments/Credits					\$0.00
Balance Due					\$3,383.35



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Invoice #: 2030

Invoice Date: 3/8/2012

Due Date: 3/8/2012

Terms: Due on receipt

BILL To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
2/1/2012	ZAndrew Adams	Prep Draft Response to Scheduling Order	3.16887	150.00	475.00
2/1/2012	ZAndrew Adams	Continue Draft Response to Scheduling Order	1.91667	150.00	287.50
2/1/2012	ZAndrew Adams	Case Management Conference Prep	1.16887	150.00	175.00
2/2/2012	ZAndrew Adams	CMC Prep	0.33333	150.00	50.00
2/3/2012	ZAndrew Adams	CMC prep and meet/ confer email	0.16667	150.00	25.00
2/3/2012	ZAndrew Adams	Scheduling order response	1.16667	150.00	175.00
2/6/2012	ZAndrew Adams	Prep CMC Statement	0.66667	150.00	100.00
2/7/2012	ZAndrew Adams	Scheduling order, P's and A's	0.33333	150.00	50.00
2/8/2012	ZAndrew Adams	Appeal Decision Review	1.5	150.00	225.00
2/9/2012	ZAndrew Adams	Review Filings	0.33333	150.00	50.00
2/10/2012	ZAndrew Adams	Reply to Opposition to Demurrer	2.41667	150.00	362.50
2/10/2012	ZAndrew Adams	Reply to Opposition to Demurrer	2.91667	150.00	437.50
2/13/2012	ZAndrew Adams	Drafting Reply to Opposition to Demurrer, Research	2.86667	150.00	445.00
2/13/2012	ZAndrew Adams	Finalize Reply to Opposition	0.58333	150.00	87.50
2/15/2012	ZAndrew Adams	Review 2.14.12 Supplement	0.83333	150.00	125.00
2/15/2012	ZAndrew Adams	Review CMC, prepare Opposition to Request for Judicial Notice. Prepare Opp to P&A's re: scheduling order	3.91667	150.00	587.50
2/16/2012	ZAndrew Adams	Review Reply to Sched Order P&A's. Work on Request for Judicial Notice.	1.2	150.00	180.00
2/17/2012	ZAndrew Adams	Prep for demurrer hearing	2.75	150.00	412.50
2/20/2012	ZAndrew Adams	Tue (21) to Thu (23) travel prep.	0.66333	150.00	97.50
2/20/2012	ZAndrew Adams	Prep for 2/22 hearings - Status Conference, Demurrer, CMC prep	1.68887	150.00	250.00
2/21/2012	ZAndrew Adams	Travel to Eureka for 2/22 hearings, Travel time billing	5.83333	150.00	1,025.00
2/21/2012	ZAndrew Adams	Review docs for 2/22 Demurrer hearing & Status Conf.	1.16887	150.00	175.00
2/22/2012	ZAndrew Adams	Prep for demurrer, status conf. CMC 2/22	2.08333	150.00	312.50
2/22/2012	ZAndrew Adams	Attend hearings on demurrer, Status Conf, & CMC, all on Squires	2.41667	150.00	362.50
2/22/2012	ZAndrew Adams	Driving from Eureka to Santa Rosa (travel on Eureka)	3.58333	150.00	537.50
2/23/2012	ZAndrew Adams	Fly back from Santa Rosa (Eureka travel time)	2.16667	150.00	325.00
2/17/2012	ZAndrew Adams	Prepare for Demurrer hearing, Research	1.58333	150.00	237.50
2/20/2012	ZAndrew Adams	Prepare for 2/22 hearings	0.7	150.00	105.00
Total					\$7,667.50
Payments/Credits					\$0.00
Balance Due					\$7,667.50



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Invoice #: 2124

Invoice Date: 4/1/2012

Due Date: 4/1/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
3/12/2012	Mark Adams	file review, edit letter to clerk re squires not serving papers on me	0.5	350.00	175.00
3/14/2012	Mark Adams	file to Squires failure to serve us with opposition	0.5	350.00	175.00
3/15/2012	Mark Adams	staff discussion re pending litigation issues	0.33333	350.00	116.67
3/15/2012	Mark Adams	review and edit reply to opposition to 2nd receiver's report	0.83333	350.00	291.67
3/15/2012	Mark Adams	finalize reply to opposition to report	0.5	350.00	175.00
Total					\$933.34
Payments/Credits					\$0.00
Balance Due					\$933.34



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Invoice

Invoice #: 2125

Invoice Date: 4/8/2012

Due Date: 4/8/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
3/12/2012	ZAndrew Adams	Review opposition to the 2nd Report	0.25	150.00	37.50
3/12/2012	ZAndrew Adams	Prep letter to court on Squires' failure to serve us with a copy of the Opp to 2nd Report	0.33333	150.00	50.00
3/14/2012	ZAndrew Adams	Reply to Opposition to 2nd Report	3	150.00	450.00
3/14/2012	ZAndrew Adams	Reply to 2nd Report Opposition	0.83333	150.00	125.00
3/16/2012	ZAndrew Adams	Reply to Opp to 2nd Report	0.83333	150.00	125.00
3/28/2012	ZAndrew Adams	Review Interrogatories etc., letter to Brad Floyd	1.66667	150.00	250.00
Total					\$1,037.50
Payments/Credits					\$0.00
Balance Due					\$1,037.50



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Invoice

Invoice #: 2186

Invoice Date: 5/1/2012

Due Date: 5/1/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
4/11/2012	Mark Adams	rvw, edit and sign letter re discovery	0.33333	360.00	116.67
4/17/2012	Mark Adams	review and edit motion for discovery protective order	0.5	350.00	175.00
Total					\$291.67
Payments/Credits					\$0.00
Balance Due					\$291.67



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Invoice

Invoice #: 2197

Invoice Date: 5/8/2012

Due Date: 5/8/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
4/2/2012	ZAndrew Adams	Response to Interrogatories, etc. from Floyd Squires. Prep letter in reply	0.5	150.00	75.00
4/10/2012	ZAndrew Adams	Interrogatories response	0.33333	150.00	50.00
4/10/2012	ZAndrew Adams	Interrogatories, discovery research and letter prep	0.41667	150.00	62.50
4/13/2012	ZAndrew Adams	Respond to discovery request from Squires	2.56333	150.00	387.50
4/13/2012	ZAndrew Adams	Discovery response and Motion	0.75	150.00	112.50
4/17/2012	ZAndrew Adams	Discovery response motion	2.33333	150.00	350.00
4/17/2012	ZAndrew Adams	Discovery responses to Squires' requests	0.91667	150.00	137.50
4/18/2012	ZAndrew Adams	Motion for protective order	0.91667	150.00	137.50
4/19/2012	ZAndrew Adams	Schedule motion for protective order, prepare motion	0.91667	150.00	137.50
4/18/2012	ZAndrew Adams	Receiver Immunity research and prep for protective order	0.33333	150.00	50.00
Total					\$1,500.00
Payments/Credits					\$0.00
Balance Due					\$1,500.00



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Invoice #: 2198

Invoice Date: 6/1/2012

Due Date: 6/1/2012

Terms: Due on receipt

BRI To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
5/18/2012	Mark Adams	file Krista Jee and file re court ruling	0.33333	350.00	116.67
5/18/2012	Mark Adams	review opposition to discovery motion, reply to Brad Lloyd	0.66667	350.00	233.33
5/21/2012	Mark Adams	re: reply to opposition to discovery motion	1.5	350.00	525.00
5/21/2012	Mark Adams	draft reply to opposition to discovery motion	1.33333	350.00	466.67
5/30/2012	Mark Adams	hearing prep and court hearing re motion for protective order, and file to hearing	2.16667	350.00	758.33
5/30/2012	Mark Adams	hearing file, letter to clerk re 2nd report	0.33333	350.00	116.67
Total					\$2,216.67
Payments/Credits					\$0.00
Balance Due					\$2,216.67



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Invoice #: 2199

Invoice Date: 6/8/2012

Due Date: 6/8/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
5/17/2012	ZAndrew Adams	Review Order from court	0.33333	150.00	50.00
5/21/2012	ZAndrew Adams	Prep reply to Motion for protective Order	2.58333	150.00	387.50
5/21/2012	ZAndrew Adams	Review Reply to Opp	0.5	150.00	75.00
5/23/2012	ZAndrew Adams	Squires discovery prep	0.41667	150.00	62.50
5/23/2012	ZAndrew Adams	Prep motion for consolidation	1	150.00	150.00
5/23/2012	ZAndrew Adams	Motion for consolidation	2	150.00	300.00
5/24/2012	ZAndrew Adams	Consolidation, ruling on the demurrer review	0.5	150.00	75.00
5/24/2012	ZAndrew Adams	Motion to consolidate research	1.08333	150.00	162.50
5/25/2012	ZAndrew Adams	Consolidation research	0.25	150.00	37.50
5/25/2012	ZAndrew Adams	Consolidation research	0.75	150.00	112.50
5/29/2012	ZAndrew Adams	Prep for 5/30 protective order hearing	0.5	150.00	75.00
5/30/2012	ZAndrew Adams	Motion for Protective Order prep & hearing on CourtCall	2.16667	150.00	325.00
	ZAndrew Adams	Consolidation research	0.75	150.00	112.50
Total					\$1,925.00
Payments/Credits					\$0.00
Balance Due					\$1,925.00



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Invoice #: 2245

Invoice Date: 7/1/2012

Due Date: 7/1/2012

Terms: Due on receipt

BIN To:

Squires 29. Eureka

Date	Service	Description	Hours	Rate	Amount
6/7/2012	Mark Adams	review pleading, research, mtg with AA re demurrer to 2nd complaint	1.5	350.00	\$525.00
Total					\$525.00
Payments/Credits					\$0.00
Balance Due					\$525.00



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Invoice #: 2244

Invoice Date: 7/8/2012

Due Date: 7/8/2012

Terms: Due on receipt

BILL To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/6/2012	ZAndrew Adams	Review 2nd Amended complaint, research	1.25	150.00	187.50
6/8/2012	ZAndrew Adams	2nd Amended complaint and research	1.41667	150.00	212.50
6/7/2012	ZAndrew Adams	Review 2nd amended complaint, research	1.16667	150.00	175.00
6/8/2012	ZAndrew Adams	2nd Amended Complaint research	1.91667	150.00	287.50
6/8/2012	ZAndrew Adams	2nd Amended Complaint research	2.18333	150.00	327.50
6/22/2012	ZAndrew Adams	Response to 2nd Amended Complaint	0.33333	150.00	50.00
6/26/2012	ZAndrew Adams	Response to 2nd amended complaint	3.08333	150.00	462.50
6/27/2012	ZAndrew Adams	Respond to 2nd Amend. Compl.	1	150.00	150.00
6/27/2012	ZAndrew Adams	Response to 2nd Amended Complaint	1.91667	150.00	287.50
6/29/2012	ZAndrew Adams	Response to 2nd Amended Complaint	0.5	150.00	75.00
6/29/2012	ZAndrew Adams	Response to SAC	0.5	150.00	75.00
6/28/2012	ZAndrew Adams	Response to SAC	1.16667	150.00	175.00
6/28/2012	ZAndrew Adams	response to 2nd amended compl	2.41667	150.00	362.50
Total					\$2,827.50
Payments/Credits					\$0.00
Balance Due					\$2,827.50



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Invoice #: 2287

Invoice Date: 8/8/2012

Due Date: 8/8/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
7/18/2012	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
7/24/2012	Mark Adams	review, approve and sign monthly accounting	0.33333	350.00	116.67
7/26/2012	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
7/30/2012	Mark Adams	demurrer hearing prep	0.33333	350.00	116.67
7/30/2012	Mark Adams	hearing prep and hearing on demurrer	1.5	350.00	525.00
Total					\$991.68
Payments/Credits					50.00
Balance Due					\$991.68



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Invoice

Invoice #: 2288

Invoice Date: 8/8/2012

Due Date: 8/8/2012

Terms: Due on receipt

BILL To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
7/2/2012	ZAndrew Adams	Prep demurer, motion to consolidate	0.16667	150.00	25.00
7/9/2012	ZAndrew Adams	Appellate, research, filing fee, etc.	0.41667	150.00	62.50
7/16/2012	ZAndrew Adams	Review Opp to demurer	0.25	150.00	37.50
7/19/2012	ZAndrew Adams	Reply to Opp to Demurer	1	150.00	150.00
7/20/2012	ZAndrew Adams	Reply to Opp to Demurer	1.16667	150.00	175.00
7/20/2012	ZAndrew Adams	Reply to Opp to Demurer	2.33333	150.00	350.00
7/23/2012	ZAndrew Adams	June Monthly Accounting	0.16667	150.00	25.00
7/25/2012	ZAndrew Adams	Discovery requests	2.83333	150.00	425.00
7/28/2012	ZAndrew Adams	Review Demurer for 7/30 hearing	0.91667	150.00	137.50
7/30/2012	ZAndrew Adams	Prep for 7/30 demurer	0.25	150.00	37.50
7/30/2012	ZAndrew Adams	Demurer hearing prep	0.75	150.00	112.50
7/30/2012	ZAndrew Adams	Demurer hearing	1.58333	150.00	237.50
7/30/2012	ZAndrew Adams	Special Interrogatories, serve discovery	0.66667	150.00	100.00
Total					\$1,875.00
Payments/Credits					\$0.00
Balance Due					\$1,875.00



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Bill To:

Squires 29, Eureka

Invoice

Invoice #: 2395

Invoice Date: 8/1/2012

Due Date: 9/1/2012

Terms: Due on receipt

Date	Service	Description	Hours	Rate	Amount
8/3/2012	Mark Adams	review and approve squires discovery	0.66667	350.00	233.33
8/9/2012	Mark Adams	file review, the Herald from Humboldt Journal	1	350.00	350.00
8/10/2012	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
8/16/2012	Mark Adams	to re new press on squires	0.6	350.00	175.00
8/17/2012	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
8/24/2012	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
Total					\$1,108.34
Payments/Credits					\$0.00
Balance Due					\$1,108.34



**CALIFORNIA
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Invoice

Invoice #: 2396

Invoice Date: 9/8/2012

Due Date: 9/8/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
8/8/2012	ZAndrew Adams	Discovery propounding	2.25	150.00	337.50
Total					\$337.50
Payments/Credits					50.00
Balance Due					\$337.50



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Invoice #: 2387
Invoice Date: 10/1/2012
Due Date: 10/1/2012
Terms: Due on receipt

BILL To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
8/13/2012	Mark Adams	met in prep for reply to fee motion	0.66667	350.00	233.33
8/18/2012	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
8/19/2012	Mark Adams	met and prep reply re fee ruling	2.5	350.00	875.00
8/20/2012	Mark Adams	finalize Squires fee pleading	0.8	350.00	175.00
8/26/2012	Mark Adams	finalize opposition to motion for protective order	1.5	350.00	525.00
8/27/2012	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
Total					\$2,041.67
Payments/Credits					\$0.00
Balance Due					\$2,041.67



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Invoice

Invoice #: 2388

Invoice Date: 10/8/2012

Due Date: 10/8/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
9/7/2012	ZAndrew Adams	Email on discovery responses	0.25	150.00	37.50
9/18/2012	ZAndrew Adams	Opp to Motion for Protective Order	2.91667	150.00	437.60
Total					\$475.00
Payments/Credits					\$0.00
Balance Due					\$475.00



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Invoice

Invoice #: 2377

Invoice Date: 11/1/2012

Due Date: 11/1/2012

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
10/4/2012	Mark Adams	research and draft reply to their fee opposition	1.8	350.00	525.00
10/11/2012	Mark Adams	l/o to court and file re-whether a ruling in yesterday's hearing	0.33333	350.00	116.67
10/19/2012	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
10/22/2012	Mark Adams	insurance discussion with Billie Jean	0.16667	350.00	58.33
10/23/2012	Mark Adams	file research re oppt for hearing	0.5	350.00	175.00
10/26/2012	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
Total					\$1,108.34
Payments/Credits					\$0.00
Balance Due					\$1,108.34



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Invoice

Invoice #: 2999

Invoice Date: 12/1/2012

Due Date: 12/1/2012

Terms: Due on receipt

BILL To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
11/30/2012	Mark Adams	case review meeting with farrah	0.33333	360.00	116.67
Total					\$116.67
Payments/Credits					\$0.00
Balance Due					\$116.67



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Invoice

Invoice #: 2484

Invoice Date: 2/1/2013

Due Date: 2/1/2013

Terms: Due on receipt

Billed To:

Squires 2B, Eureka

Date	Service	Description	Hours	Rate	Amount
1/10/2013	Mark Adams	file review, clerk letter re payment of fees.	0.83333	350.00	291.67
Total					\$291.67
Payments/Credits					\$0.00
Balance Due					\$291.67



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Invoice

Invoice #: 2534

Invoice Date: 3/1/2013

Due Date: 3/1/2013

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
2/13/2013	Mark Adams	W/E Weinstein re accounting and expenses	0.33333	350.00	116.67
2/25/2013	Mark Adams	staff discussion re pending issues and long delays in court approval of fees	0.33333	350.00	116.67
Total					\$233.34
Payments/Credits					\$0.00
Balance Due					\$233.34



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Squires 29, Eureka

Invoice

Invoice #: 2535

Invoice Date: 3/8/2013

Due Date: 3/8/2013

Terms: Due on receipt

Date	Service	Description	Hours	Rate	Amount
2/26/2013	ZAndrew Adams	Look into timing of rulings, appeal issues	0.83333	150.00	125.00
Total					\$125.00
Payments/Credits					\$0.00
Balance Due					\$125.00



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Invoice

Invoice #: 2583

Invoice Date: 4/1/2013

Due Date: 4/1/2013

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
3/4/2013	Mark Adams	review discovery letter, ltr Andrew, sign responsive letter	0.5	350.00	175.00
3/8/2013	Mark Adams	ltr re discovery and ltr with channel 3 reporter	0.5	350.00	175.00
3/18/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	118.67
3/22/2013	Mark Adams	staff meeting re discovery compliance and ltr	0.66667	350.00	233.33
3/25/2013	Mark Adams	review emails in relation to squires discovery	1	350.00	350.00
Total					\$1,050.00
Payments/Credits					\$0.00
Balance Due					\$1,050.00



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Invoice

Invoice #: 2584
Invoice Date: 4/8/2013
Due Date: 4/8/2013
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
3/4/2013	ZAndrew Adams	Review recent filings/orders, Discovery issues.	1.58333	150.00	237.50
3/5/2013	ZAndrew Adams	Review outstanding decisions.	0.41667	150.00	62.50
3/5/2013	ZAndrew Adams	Letter to the court re: Answer	0.58333	150.00	87.50
3/5/2013	ZAndrew Adams	Discovery issues, letter to the court	0.25	150.00	37.50
3/14/2013	ZAndrew Adams	Discovery responses	3.16667	150.00	475.00
3/14/2013	ZAndrew Adams	Prep discovery responses	1.25	150.00	187.50
3/22/2013	ZAndrew Adams	Prep Discovery responses	1.08333	150.00	162.50
3/28/2013	ZAndrew Adams	Discovery responses	1	150.00	150.00
Total					\$1,400.00
Payments/Credits					\$0.00
Balance Due					\$1,400.00



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Invoice

Invoice #: 2828

Invoice Date: 5/1/2013

Due Date: 5/1/2013

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
4/5/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
	Mark Adams	AA meeting re vacation update on pending issues	0.33333	350.00	116.67

Total \$233.34

Payments/Credits \$0.00

Balance Due \$233.34



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Invoice

Invoice #: 2627

Invoice Date: 5/8/2013

Due Date: 5/8/2013

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
4/10/2013	ZAndrew Adams	Discovery, seek responses from Floyd firm	0.25	200.00	50.00
4/29/2013	ZAndrew Adams	Prep discovery responses, meet & confer letter	0.25	200.00	50.00
4/30/2013	ZAndrew Adams	Respond to Brad Floyd's letter re: discovery.	3.66887	200.00	733.33
Total					\$833.33
Payments/Credits					\$0.00
Balance Due					\$833.33



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Invoice

Invoice #: 2676
Invoice Date: 6/1/2013
Due Date: 6/1/2013
Terms: Due on receipt

BH To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
5/2/2013	Mark Adams	mtg re discovery response letter	0.5	350.00	175.00
5/22/2013	Mark Adams	AA discussion re discovery letters	0.5	350.00	175.00
5/23/2013	Mark Adams	review AA motion re discovery	0.33333	350.00	116.67
5/23/2013	Mark Adams	AA call re discovery motions	0.33333	350.00	116.67
5/23/2013	Mark Adams	further review and approval for discovery motion	0.66667	350.00	233.33
5/31/2013	Mark Adams	work on recalver fee report	2	350.00	700.00
Total					\$1,516.67
Payments/Credits					90.00
Balance Due					\$1,516.67



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Invoice

Invoice #: 2677

Invoice Date: 6/8/2013

Due Date: 6/8/2013

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
5/1/2013	Andrew Adams	Prep meet & confer letter	1.41667	200.00	283.33
5/3/2013	Andrew Adams	Discovery response letter	0.58333	200.00	116.67
5/22/2013	Andrew Adams	Squires v. Adams, review new filings	2.16667	200.00	433.33
5/22/2013	Andrew Adams	Motion for relief from waiver	2.33333	200.00	466.67
5/23/2013	Andrew Adams	Prep Motion for Relief	0.75	200.00	150.00
Total					\$1,450.00
Payments/Credits					\$0.00
Balance Due					\$1,450.00



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Invoice

Invoice #: 2846

Invoice Date: 7/1/2013

Due Date: 7/1/2013

Terms: Due on receipt

BIB To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/3/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
6/17/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
6/18/2013	Mark Adams	review edit and approve reply to opposition re waiver motion	0.5	350.00	175.00
6/18/2013	Mark Adams	draft 3rd report re fees	2	350.00	700.00
6/19/2013	Mark Adams	finalize 3rd report re fees	0.83333	350.00	291.67
6/24/2013	Mark Adams	hearing prep. court call appearance re discovery motions	1.5	350.00	525.00
6/26/2013	Mark Adams	AA discussion re pending issues	0.16667	350.00	58.33
6/25/2013	Mark Adams	call clerk office, fu letter re fee request	1	350.00	350.00
Total					\$2,333.34
Payments/Credits					\$0.00
Balance Due					\$2,333.34



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Invoice #: 2847

Invoice Date: 7/8/2013

Due Date: 7/8/2013

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/3/2013	Andrew Adams	Review request for fees/costs	0.33333	200.00	66.67
6/5/2013	Andrew Adams	Discovery responses from Plaintiff	1.75	200.00	350.00
6/6/2013	Andrew Adams	Opp to Motion to Compel	0.66667	200.00	133.33
6/7/2013	Andrew Adams	Prep Opp to Motion to Compel	2.25	200.00	450.00
6/10/2013	Andrew Adams	prep separate statement	1.56233	200.00	312.67
6/11/2013	Andrew Adams	Opp to Motion to Compel & Separate Statement	2.16667	200.00	433.33
6/13/2013	Andrew Adams	Look for Opp for Motion for relief	0.41667	200.00	83.33
6/17/2013	Andrew Adams	Reply to Opp to Motion for Relief from Waiver	1.16667	200.00	233.33
6/18/2013	Andrew Adams	Reply to Opp to Motion for Relief	0.25	200.00	50.00
6/18/2013	Andrew Adams	Reply to Opp	0.41667	200.00	83.33
6/19/2013	Andrew Adams	3rd Report	1.16667	200.00	233.33
6/19/2013	Andrew Adams	3rd Report	1.16667	200.00	233.33
Total					\$2,666.65
Payments/Credits					\$0.00
Balance Due					\$2,666.65



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Invoice

Invoice #: 2848

Invoice Date: 8/1/2013

Due Date: 8/1/2013

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
7/15/2013	Mark Adams	review court tentative ruling, the email re interpretation	0.5	350.00	175.00
7/15/2013	Mark Adams	draft reply to opposition to 3rd receiver report	1.16667	350.00	408.33
7/15/2013	Mark Adams	to E Weinstein re cashflow needs	0.16667	350.00	58.33
7/16/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
7/31/2013	Mark Adams	staff discussion re pending issues, including EW re c/l issues	0.33333	350.00	116.67
Total					\$875.00
Payments/Credits					\$0.00
Balance Due					\$875.00



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Invoice

Invoice #: 2649
Invoice Date: 8/6/2013
Due Date: 8/5/2013
Terms: Due on receipt

Bill To:
Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
7/8/2013	Andrew Adams	Receive/read interim order.	0.41667	200.00	83.33
7/16/2013	Andrew Adams	Review Reply	0.33333	200.00	66.67
Total					\$150.00
Payments/Credits					\$0.00
Balance Due					\$150.00



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Invoice

Invoice #: 2850
Invoice Date: 9/1/2013
Due Date: 9/1/2013
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
8/16/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
Total					\$116.67
Payments/Credits					\$0.00
Balance Due					\$116.67



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Invoice

Invoice #: 2904

Invoice Date: 10/1/2013

Due Date: 10/1/2013

Terms: Due on receipt

Bill To:

Squires 2B, Eureka

Date	Service	Description	Hours	Rate	Amount
9/13/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
9/13/2013	Mark Adams	AA meeting re strategy	0.33333	350.00	116.67
9/18/2013	Mark Adams	draft and sign 4th report re fees	1.5	350.00	525.00
9/18/2013	Mark Adams	review add and return proposed order on 3rd report	0.83333	350.00	291.67
9/20/2013	Mark Adams	review and respond to emails re proposed order re fees	0.33333	350.00	116.67
10/24/2013	Mark Adams	staff discussion of pending case issues	0.33333	350.00	116.67
Total					\$1,283.35
Payments/Credits					\$0.00
Balance Due					\$1,283.35



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Invoice

Invoice #: 2005

Invoice Date: 10/6/2013

Due Date: 10/6/2013

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
9/10/2013	Andrew Adams	Review order on discovery motions, notice of ruling/order, further answers	0.83333	200.00	166.67
9/13/2013	Andrew Adams	Discuss litigation, discovery going forward	0.25	200.00	50.00
9/16/2013	Andrew Adams	Replacement procedure, discharge	1.08333	200.00	216.67
9/18/2013	Andrew Adams	Appeal issues, discuss	0.5	200.00	100.00
9/19/2013	Andrew Adams	Review Court rulings, prep proposed order	1.5	200.00	300.00
9/19/2013	Andrew Adams	Discovery responses per motion to compel	1.58333	200.00	316.67
9/20/2013	Andrew Adams	Proposed Order	0.75	200.00	150.00
9/23/2013	Andrew Adams	Discovery further responses	0.91667	200.00	183.33
9/24/2013	Andrew Adams	Discovery further responses	0.75	200.00	150.00
9/24/2013	Andrew Adams	Prep CMC statement	0.16667	200.00	33.33
9/26/2013	Andrew Adams	Squires proposed order.	0.33333	200.00	66.67
Total					\$1,733.34
Payments/Credits					\$0.00
Balance Due					\$1,733.34



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Invoice

Invoice #: 2952

Invoice Date: 11/1/2013

Due Date: 11/1/2013

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
10/1/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
10/15/2013	Mark Adams	fu re AA report on case management conference	0.33333	350.00	116.67
10/16/2013	Mark Adams	t/c Lisa Johnson, research fu emails re old valuations	0.33333	350.00	116.67
Total					\$350.01
Payments/Credits					\$0.00
Balance Due					\$350.01



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Invoice

Invoice #: 2953

Invoice Date: 11/8/2013

Due Date: 11/8/2013

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
10/15/2013	Andrew Adams	CMC Court Call	0.5	200.00	100.00
Total					\$100.00
Payments/Credits					\$0.00
Balance Due					\$100.00



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Invoice

Invoice #: 3021

Invoice Date: 12/1/2013

Due Date: 12/1/2013

Terms: Due on receipt

BILL To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
11/1/2013	Mark Adams	staff discussion re pending issues. f/u	0.33333	350.00	116.67
11/21/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
Total					\$233.34
Payments/Credits					\$0.00
Balance Due					\$233.34



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Invoice

Invoice #: 3022

Invoice Date: 12/8/2013

Due Date: 12/8/2013

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
11/4/2013	Andrew Adams	11/4 hearing court call, hearing prep	0.81667	200.00	163.33
11/21/2013	Andrew Adams	Discuss litigation, plan	0.16667	200.00	33.33
Total					\$216.66
Payments/Credits					\$0.00
Balance Due					\$216.66



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Invoice

Invoice #: 3079

Invoice Date: 1/1/2014

Due Date: 1/1/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
12/2/2013	Mark Adams	staff discussion re pending issues, prep for upcoming case management conference	0.33333	350.00	116.67
12/13/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
12/30/2013	Mark Adams	staff discussion re pending issues	0.33333	350.00	116.67
Total					\$350.01
Payments/Credits					\$0.00
Balance Due					\$350.01



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Invoice

Invoice #: 3080
Invoice Date: 1/8/2014
Due Date: 1/8/2014
Terms: Due on receipt

BILL To:
Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
12/13/2013	Andrew Adams	Discuss property and next steps at property meeting	0.16667	200.00	33.33
12/16/2013	Andrew Adams	Prep for 12/16 CMC	0.25	200.00	50.00
12/16/2013	Andrew Adams	Squires CMC	0.41667	200.00	83.33
12/20/2013	Andrew Adams	CourtCall on CMC, prep declaration on CourtCall:	1	200.00	200.00

Total \$366.66

Payments/Credits \$0.00

Balance Due \$366.66



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Invoice #: 3132

Invoice Date: 2/1/2014

Due Date: 2/1/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
1/10/2014	Mark Adams	staff discussion of pending issues	0.33333	350.00	116.67
1/20/2014	Mark Adams	staff discussion re pending issues especially enforcement of fee order	0.33333	350.00	116.67
1/20/2014	Mark Adams	bookkeeper Vc re pending issues	23.3	350.00	8,155.00
1/21/2014	Mark Adams	future prep of certificate	0.5	350.00	175.00
1/24/2014	Mark Adams	discussion of all issues with bookkeeper	0.3	350.00	105.00
1/28/2014	Mark Adams	staff discussion re pending issues	0.3	350.00	105.00
2/1/2014	Mark Adams	Vc bookkeeper re all issues	0.3	350.00	105.00
Total					\$8,878.34
Payments/Credits					\$0.00
Balance Due					\$8,878.34



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Invoice

Invoice #: 3133
Invoice Date: 2/6/2014
Due Date: 2/6/2014
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
1/9/2014	Andrew Adams	Research for trial prep	0.08333	200.00	16.67
1/20/2014	Andrew Adams	Discuss at property meeting	0.25	200.00	50.00
1/21/2014	Andrew Adams	Property list for lien recording	0.16667	200.00	33.33
1/28/2014	Andrew Adams	Report on service, filing of docs	0.58333	200.00	116.67
1/30/2014	Andrew Adams	5th Report	0.25	200.00	50.00
Total					\$266.67
Payments/Credits					\$0.00
Balance Due					\$266.67



CALIFORNIA
RECEIVERSHIP
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Invoice

2716 Ocean Park Blvd.
Suite 3010

310-471-3181
www.calreceivers.com

Invoice #: 3188
Invoice Date: 3/1/2014
Due Date: 3/1/2014
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
2/6/2014	Mark Adams	to bookkeeper re pending cashflow matters	0.2	350.00	70.00
2/7/2014	Mark Adams	staff discussion re pending issues	0.3	350.00	105.00
2/11/2014	Mark Adams	emails re title abstractor and title to squires properties	0.2	350.00	70.00
2/13/2014	Mark Adams	review title records from service	0.3	350.00	105.00
2/18/2014	Mark Adams	staff discussion re pending issues	0.3	350.00	105.00
2/19/2014	Mark Adams	file re their ex parte notice	0.3	350.00	105.00
2/25/2014	Mark Adams	review edit and approve opposition to motion for reconsideration	1.4	350.00	490.00
2/27/2014	Mark Adams	file re who will appear on Monday via Court Call	0.3	350.00	105.00
2/28/2014	Mark Adams	to bookkeeper re pending issues	0.1	350.00	35.00
Total					\$1,190.00
Payments/Credits					\$0.00
Balance Due					\$1,190.00



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Invoice

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Suite 3010

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Invoice #: 3190

Invoice Date: 3/8/2014

Due Date: 3/8/2014

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
2/6/2014	Andrew Adams	Prep for 2/7 CMC	0.16667	200.00	33.33
2/7/2014	Andrew Adams	Attend CMC	1.08333	200.00	216.67
2/13/2014	Andrew Adams	Review property profiles, recorded docs	0.75	200.00	150.00
2/14/2014	Andrew Adams	Review documents filed with Court, orders	0.25	200.00	50.00
2/18/2014	Andrew Adams	Review ex parte draft sent from Squires' counsel, respond via email	1.08333	200.00	216.67
2/20/2014	Andrew Adams	Email with counsel re 2/25 ex parte, discussion on travel and time/court call	0.5	200.00	100.00
2/21/2014	Andrew Adams	Draft Opp to Motion for Consideration	1.16667	200.00	233.33
2/22/2014	Andrew Adams	Opp to Motion to Reconsider	0.5	200.00	100.00
2/22/2014	Andrew Adams	Opp to motion for reconsideration	2.08333	200.00	416.67
2/25/2014	Andrew Adams	Opp to Motion to reconsider	3.08333	200.00	616.67
2/25/2014	Andrew Adams	Opp to Motion for Reconsideration	0.5	200.00	100.00
2/25/2014	Andrew Adams	Opp to Motion for Reconsideration	1.08333	200.00	216.67
2/26/2014	Andrew Adams	Opp to Motion for Reconsideration	1.66667	200.00	333.33
Total					\$2,766.68
Payments/Credits					\$0.00
Balance Due					\$2,766.68



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BILL To:

Squires 29, Eureka

Invoice

Invoice #: 3383

Invoice Date: 4/1/2014

Due Date: 4/1/2014

Terms: Due on receipt

Date	Service	Description	Hours	Rate	Amount
3/4/2014	Mark Adams	staff discussion re pending issues	0.2	350.00	70.00
3/12/2014	Mark Adams	to re trial arrangements, email AA	0.3	350.00	105.00
3/14/2014	Mark Adams	LACLL research on various issues and travel	1.2	350.00	420.00
3/17/2014	Mark Adams	staff discussion re pending issues	0.2	350.00	70.00
3/21/2014	Mark Adams	to bookkeeper re pending issues	0.2	350.00	70.00
3/28/2014	Mark Adams	to bookkeeper re off issues	0.2	350.00	70.00
3/28/2014	Mark Adams	staff discussion re pending issues	0.2	350.00	70.00
3/11/2014	Mark Adams	staff discussion re pending issues	0.3	350.00	105.00

Total \$980.00

Payments/Credits \$0.00

Balance Due \$980.00



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Invoice

Invoice #: 3364
Invoice Date: 4/8/2014
Due Date: 4/8/2014
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
3/3/2014	Andrew Adams	Prep for, attend motion for reconsideration hearing via court call.	1.16667	200.00	233.33
3/28/2014	Andrew Adams	Discuss at property meeting	0.16667	200.00	33.33
Total					\$266.66
Payments/Credits					\$0.00
Balance Due					\$266.66



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Invoice

Invoice #: 3770

Invoice Date: 5/1/2014

Due Date: 5/1/2014

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
4/3/2014	Mark Adams	staff discussion and f/u re pending issues	0.2	350.00	70.00
4/4/2014	Mark Adams	tr bookkeeper re pending issues	0.1	350.00	35.00
4/10/2014	Mark Adams	staff discussion re pending issues	0.3	350.00	105.00
4/17/2014	Mark Adams	staff discussion re pending issues and f/u	0.3	350.00	105.00
4/23/2014	Mark Adams	staff discussion re pending issues, f/u	0.2	350.00	70.00
Total					\$385.00
Payments/Credits					\$0.00
Balance Due					\$385.00



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Invoice

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Invoice #: 3771

Invoice Date: 5/4/2014

Due Date: 5/4/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
4/2/2014	Tyler Huxtable	Called court re motion for reconsideration	0.08333	75.00	6.25
4/3/2014	Tyler Huxtable	Staff discussion re pending issues	0.08333	75.00	6.25
4/17/2014	Tyler Huxtable	Staff discussion re pending issues	0.1	75.00	7.50
4/21/2014	Tyler Huxtable	Schedule CourtCall appearance for 4/25 hearing	0.2	75.00	15.00
4/25/2014	Tyler Huxtable	Update calendar re next CMC	0.1	75.00	7.50
Total					\$42.50
Payments/Credits					\$0.00
Balance Due					\$42.50



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Invoice

Invoice #: 3772

Invoice Date: 5/4/2014

Due Date: 5/4/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
4/10/2014	2_Marcy Wahde	Staff meeting re: outstanding issues	0.1	100.00	10.00
4/17/2014	Marcy Wahde	Staff discussion re: outstanding issues	0.1	100.00	10.00
Total					\$20.00
Payments/Credits					\$0.00
Balance Due					\$20.00



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Invoice

Invoice #: 3773
Invoice Date: 6/1/2014
Due Date: 6/1/2014
Terms: Due on receipt

Bill To:
Squires 20, Eureka

Date	Service	Description	Hours	Rate	Amount
5/3/2014	Mark Adams	Vc bookkeeper re pending issues	0.1	350.00	35.00
5/5/2014	Mark Adams	draft and send email lenders information in preparation for call	0.2	350.00	70.00
5/6/2014	Mark Adams	staff discussion re pending issues	0.2	350.00	70.00
6/9/2014	Mark Adams	vc bookkeeper re pending issues	0.1	350.00	35.00
5/12/2014	Mark Adams	AA meeting and Vu re settlement conference and retention of local counsel	0.3	350.00	105.00
5/12/2014	Mark Adams	staff discussion re pending issues, mlec Vu	0.2	350.00	70.00
5/13/2014	Mark Adams	AA discussion re retention of local counsel	0.3	350.00	105.00
5/14/2014	Mark Adams	review edit and sign financing related docs to Gerald Feldman	0.4	350.00	140.00
5/15/2014	Mark Adams	Vc bookkeeper re pending issues	0.1	350.00	35.00
5/16/2014	Mark Adams	Vc AA re new counsel in Eureka, Vu	0.4	350.00	140.00
5/16/2014	Mark Adams	review counsel contract, AA discussion, sign and return retainer	0.5	350.00	175.00
5/19/2014	Mark Adams	AA meeting re preparation for attorney call and litigation strategy	0.4	350.00	140.00
5/19/2014	Mark Adams	Vc new attorney re settlement conference and terms, Vu with AA	1.2	350.00	420.00
5/19/2014	Mark Adams	MSC prep, break out litigation v receivership unpaid time	0.8	350.00	315.00
5/20/2014	Mark Adams	post mediation Vc with Neal, Vu discussion, new settlement offer	1	350.00	350.00
5/22/2014	Mark Adams	staff discussion re pending issues	0.3	350.00	105.00
6/2/2014	Mark Adams	Vc bookkeeper re pending issues	0.1	350.00	35.00
Total					\$2,345.00
Payments/Credits					\$0.00
Balance Due					\$2,345.00



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Invoice

Invoice #: 3774

Invoice Date: 5/4/2014

Due Date: 5/4/2014

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
5/5/2014	Tyler Huxtable	Staff discussion re pending issues	0.1	75.00	7.50
5/6/2014	Tyler Huxtable	Call court re Motion for Reconsideration status	0.2	75.00	15.00
5/12/2014	Tyler Huxtable	Staff discussion re pending issues	0.2	75.00	15.00
5/13/2014	Tyler Huxtable	Call to clerk re hearing time and motion for reconsideration	0.2	75.00	15.00
5/13/2014	Tyler Huxtable	Prepare, file and serve mandatory settlement statement	0.8	75.00	60.00
5/14/2014	Tyler Huxtable	Research for MA car service to Eureka for hearing	0.8	75.00	60.00
5/14/2014	Tyler Huxtable	Plan M Adams car service re hearing	0.6	75.00	45.00
5/15/2014	Tyler Huxtable	Appeal status research	0.2	75.00	15.00
5/16/2014	Tyler Huxtable	Research re appeals for M Adams	0.1	75.00	7.50
5/18/2014	Tyler Huxtable	Send Attorney-Client Fee contract to M Adams	0.1	75.00	7.50
5/18/2014	Tyler Huxtable	Research and forward pertinent pleadings to new counsel Neil Lett	2.5	75.00	187.50
5/18/2014	Tyler Huxtable	Research and send documents to N Lett	0.3	75.00	22.50
5/21/2014	Tyler Huxtable	Update calendar re trial dates	0.1	75.00	7.50
5/22/2014	Tyler Huxtable	Staff discussion re pending issues	0.1	75.00	7.50
Total					\$472.50
Payments/Credits					\$0.00
Balance Due					\$472.50



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Invoice

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Invoice #: 3775

Invoice Date: 6/4/2014

Due Date: 6/4/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
5/6/2014	Marcy Wehde	Search for order authorizing \$15K certificate, emails w/ GF, MA, YF re: the same	0.2	100.00	20.00
5/6/2014	Marcy Wehde	Draft Assignment of DOT	0.6	100.00	60.00
5/7/2014	Marcy Wehde	Finish drafting Assignment of DOT, emails w/MA re: the same	0.4	100.00	40.00
5/9/2014	Marcy Wehde	F/u emails w/ MA re: Assignment of DOT	0.1	100.00	10.00
5/9/2014	Marcy Wehde	Notarize document, send to G. Feldman	0.2	100.00	20.00
5/12/2014	Marcy Wehde	Staff discussion re: outstanding issues	0.1	100.00	10.00
5/13/2014	Marcy Wehde	Research recorded copies of documents, download and send to GF	0.2	100.00	20.00
5/15/2014	Marcy Wehde	Emails w/ MA re: guarantee language	0.1	100.00	10.00
5/15/2014	Marcy Wehde	Scan and save Assignment and Guarantee, overnight originals to G. Feldman, emails re: the same	0.4	100.00	40.00
5/16/2014	Marcy Wehde	Emails w/ G. Feldman re: original DOT docs, download and send the same	0.2	100.00	20.00
5/17/2014	Marcy Wehde	Emails w/ MA re: status of DOT	0.1	100.00	10.00
5/20/2014	Marcy Wehde	Retrieve original documents, send to GF via overnight mail	0.2	100.00	20.00
5/21/2014	Marcy Wehde	file email w/ GF re: funding	0.1	100.00	10.00
5/21/2014	Marcy Wehde	Update At a Glance, prepare for staff meeting.	0.1	100.00	10.00
5/22/2014	Marcy Wehde	Staff discussion re: outstanding issues	0.2	100.00	20.00
5/27/2014	Marcy Wehde	Create wiring instructions, emails w/ Sunset One and EW	0.3	100.00	30.00
Total					\$370.00
Payments/Credits					\$0.00
Balance Due					\$370.00



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Invoice

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Invoice #: 3776

Invoice Date: 6/8/2014

Due Date: 6/8/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
5/12/2014	Andrew Adams	Research for settlement conf.	1.41667	200.00	283.33
5/13/2014	Andrew Adams	Settlement conference statement	0.66667	200.00	133.33
5/13/2014	Andrew Adams	Settlement Conference Statement	0.83333	200.00	166.67
5/15/2014	Andrew Adams	Call with new counsel, discuss with MA, send docs to new counsel for review.	0.75	200.00	150.00
5/19/2014	Andrew Adams	Discuss Settlement Conf. w. MA	0.41667	200.00	83.33
5/19/2014	Andrew Adams	Call with counsel	1	200.00	200.00
5/19/2014	Andrew Adams	prep ex parte for retention, prep memo on recovery.	0.41667	200.00	83.33
5/21/2014	Andrew Adams	Discuss settlement options	0.75	200.00	150.00
Total					\$1,249.99
Payments/Credits					\$0.00
Balance Due					\$1,249.99



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Invoice

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Invoice #: 3917

Invoice Date: 7/1/2014

Due Date: 7/1/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/2/2014	Mark Adams	staff discussion re pending issues	0.3	350.00	105.00
6/8/2014	Mark Adams	court call appearance to observe CMC	1.68887	350.00	593.33
6/8/2014	Mark Adams	t/c bookkeeper re pending issues	0.8	350.00	280.00
6/9/2014	Mark Adams	update counsel re CMC and filing of fee motion	0.3	350.00	105.00
6/12/2014	Mark Adams	prep for and f/u to t/c with Neal Latt re trial prep	1.23333	350.00	431.67
6/12/2014	Mark Adams	t/c bookkeeper re pending c/f issues	0.1	350.00	35.00
6/13/2014	Mark Adams	staff discussion re pending issues	0.2	350.00	70.00
6/20/2014	Mark Adams	emails with counsel, file review re trial	0.3	350.00	105.00
6/20/2014	Mark Adams	t/c bookkeeper re current c/f issues	0.1	350.00	35.00
6/21/2014	Mark Adams	staff discussion re pending issues	0.3	350.00	105.00
6/26/2014	Mark Adams	t/c bookkeeper re pending c/f issues	0.1	350.00	35.00
6/27/2014	Mark Adams	staff discussion re pending issues	0.2	350.00	70.00
Total					\$1,960.00
Payments/Credits					\$0.00
Balance Due					\$1,960.00



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Invoice

Invoice #: 3918

Invoice Date: 7/4/2014

Due Date: 7/4/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/2/2014	Tyler Huxtable	Staff discussion re pending issues	0.1	75.00	7.50
6/4/2014	Tyler Huxtable	Schedule Court/Call appearance for upcoming hearing	0.2	75.00	15.00
6/5/2014	Tyler Huxtable	Call to court re status of order on motion for reconsideration	0.2	75.00	15.00
6/12/2014	Tyler Huxtable	Forward settlement case docs to N Latt	0.2	75.00	15.00
6/13/2014	Tyler Huxtable	Staff discussion re pending issues	0.1	75.00	7.50
6/16/2014	Tyler Huxtable	Forward docs to N Latt	0.1	75.00	7.50
6/17/2014	Tyler Huxtable	Calendar updated readiness conference	0.1	75.00	7.50
6/17/2014	Tyler Huxtable	Forward case docs to N Latt	0.1	75.00	7.50
6/19/2014	Tyler Huxtable	Process and forward signed application for attorney's fees to N Latt	0.2	75.00	15.00
6/19/2014	Tyler Huxtable	File and serve Application	0.5	75.00	37.50
Total					\$135.00
Payments/Credits					\$0.00
Balance Due					\$135.00



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Invoice

Invoice #: 3919

Invoice Date: 7/4/2014

Due Date: 7/4/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
8/1/2014	Marcy Wehde	Update At a Glance	0.1	100.00	10.00
8/4/2014	Marcy Wehde	Document audit for investor docs, update spreadsheet	0.4	100.00	40.00
8/13/2014	Marcy Wehde	Staff meeting re: outstanding issues	0.1	100.00	10.00
Total					\$60.00
Payments/Credits					\$0.00
Balance Due					\$60.00



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Invoice

Invoice #: 3820

Invoice Date: 7/8/2014

Due Date: 7/8/2014

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
6/12/2014	Andrew Adams	Call with counsel, review trial prep docs.	2.08333	200.00	416.67
6/12/2014	Andrew Adams	Research for trial counsel.	0.58333	200.00	116.67
6/13/2014	Andrew Adams	Discusses at Property Meeting	0.16667	200.00	33.33
6/17/2014	Andrew Adams	Edits to application to hire counsel.	0.33333	200.00	66.67
6/17/2014	Andrew Adams	Edits to ex parte to hire counsel.	0.41667	200.00	83.33
6/20/2014	Andrew Adams	Discusses at property meeting, plan next steps	0.16667	200.00	33.33
Total					\$750.00
Payments/Credits					\$0.00
Balance Due					\$750.00



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Invoice

Invoice #: 4154

Invoice Date: 8/1/2014

Due Date: 8/1/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
7/3/2014	Mark Adams	staff discussion re pending issues	0.2	350.00	70.00
7/10/2014	Mark Adams	l/c bookkeeper re pending c/r issues	0.1	350.00	35.00
Total					\$105.00
Payments/Credits					\$0.00
Balance Due					\$105.00



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Invoice

Invoice #: 4155

Invoice Date: 8/4/2014

Due Date: 8/4/2014

Terms: Due on receipt

Billed To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
7/7/2014	Tyler Huxtable	Put trial readiness conference and jury trial on calendar	0.2	75.00	15.00
7/7/2014	Tyler Huxtable	Call to Humboldt Court re: attorney mailbox delivery	0.1	75.00	7.50
7/22/2014	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	75.00	7.50
Total					\$30.00
Payments/Credits					\$0.00
Balance Due					\$30.00



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Invoice

Invoice #: 4156

Invoice Date: 8/4/2014

Due Date: 8/4/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
7/22/2014	Marcy Wehde	Staff discussion re: outstanding issues	0.1	100.00	10.00
Total					\$10.00
Payments/Credits					\$0.00
Balance Due					\$10.00



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Invoice

Invoice #: 4331

Invoice Date: 9/1/2014

Due Date: 9/1/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
8/4/2014	Mark Adams	staff discussion re pending issues	0.1	350.00	35.00
8/12/2014	Mark Adams	staff discussion of pending issues	0.1	350.00	35.00
Total					\$70.00
Payments/Credits					\$0.00
Balance Due					\$70.00



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Invoice

Invoice #: 4332
Invoice Date: 9/4/2014
Due Date: 9/4/2014
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
8/4/2014	Tyler Huxtable	Staff discussion re pending issues and follow-up	0.1	75.00	7.50
8/12/2014	Tyler Huxtable	Staff discussion re pending issues and follow-up	0.1	75.00	7.50
Total					\$15.00
Payments/Credits					\$0.00
Balance Due					\$15.00



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Invoice

Invoice #: 4333

Invoice Date: 9/4/2014

Due Date: 9/4/2014

Terms: Due on receipt

BILL To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
8/4/2014	Marcy Wehde	Staff discussion re: outstanding issues	0.1	100.00	10.00
8/12/2014	Marcy Wehde	Staff Meeting re: outstanding issues	0.1	100.00	10.00
Total					\$20.00
Payments/Credits					\$0.00
Balance Due					\$20.00



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Bill To:

Squires 39, Eureka

Invoice

Invoice #: 4533

Invoice Date: 10/1/2014

Due Date: 10/1/2014

Terms: Due on receipt

Date	Service	Description	Hours	Rate	Amount
8/12/2014	Mark Adams	review court orders re fees and certificates, thru email exchanges with AA	0.3	350.00	105.00
9/24/2014	Mark Adams	review emails from Dean Puod and various email exchanges re Floyd hiring Ann Macky.	0.3	350.00	105.00
8/28/2014	Mark Adams	staff discussion of pending issues	0.1	350.00	35.00
8/25/2014	Mark Adams	bookkeeper b/c re pending issues	0.1	350.00	35.00
Total					\$280.00
Payments/Credits					\$0.00
Balance Due					\$280.00



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Invoice

Invoice #: 4534

Invoice Date: 10/4/2014

Due Date: 10/4/2014

Terms: Due on receipt

Billed To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
9/29/2014	Tyler Huxtable	Scan and forward signed email to MA	0.1	75.00	7.50
9/29/2014	Tyler Huxtable	Staff discussion re pending issues and follow-up	0.1	75.00	7.50
Total					\$15.00
Payments/Credits					\$0.00
Balance Due					\$15.00



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Invoice

Invoice #: 4535

Invoice Date: 10/4/2014

Due Date: 10/4/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
9/30/2014	Marcy Wehde	Staff meeting to discuss o/s issues	0.1	100.00	10.00
Total					\$10.00
Payments/Credits					\$0.00
Balance Due					\$10.00



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Invoice #: 4758

Invoice Date: 11/1/2014

Due Date: 11/1/2014

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
10/8/2014	Mark Adams	Staff discussion re pending issues	0.1	350.00	35.00
10/16/2014	Mark Adams	Staff discussion of pending issues	0.1	350.00	35.00
10/23/2014	Mark Adams	Staff discussion re pending issues	0.1	350.00	35.00
Total					\$105.00
Payments/Credits					\$0.00
Balance Due					\$105.00



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Invoice

Invoice #: 4759

Invoice Date: 11/4/2014

Due Date: 11/4/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
10/09/2014	Tyler Huxtable	Staff discussion re pending issues and follow-up	0.1	75.00	7.50
10/16/2014	Tyler Huxtable	Staff discussion re pending issues and follow-up	0.1	75.00	7.50
10/23/2014	Tyler Huxtable	Staff discussion re pending issues and follow-up	0.1	75.00	7.50
10/30/2014	Tyler Huxtable	Staff discussion re pending issues and follow-up	0.1	75.00	7.50
Total					\$30.00
Payments/Credits					\$0.00
Balance Due					\$30.00



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Invoice

Invoice #: 4760
Invoice Date: 11/4/2014
Due Date: 11/4/2014
Terms: Due on receipt

Bill To:
Squares 28, Eureka

Date	Service	Description	Hours	Rate	Amount
10/8/2014	Marcy Wehde	Staff meeting to discuss o/s issues	0.1	100.00	10.00
10/15/2014	Marcy Wehde	staff meeting re: o/s issues	0.1	100.00	10.00
10/23/2014	Marcy Wehde	Staff Meeting to discuss o/s issues	0.1	100.00	10.00
10/30/2014	Marcy Wehde	Staff meeting re: o/s issues	0.1	100.00	10.00
Total					\$40.00
Payments/Credits					\$0.00
Balance Due					\$40.00



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Invoice

Invoice #: 4761
Invoice Date: 11/4/2014
Due Date: 11/4/2014
Terms: Due on receipt

Bill To:
Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
10/16/2014	ZSally Rowshan	Staff Meeting	0.1	300.00	30.00
Total					\$30.00
Payments/Credits					\$0.00
Balance Due					\$30.00



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Invoice

Invoice #: 4961

Invoice Date: 12/1/2014

Due Date: 12/1/2014

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
11/13/2014	Mark Adams	staff discussion re pending issues	0.1	350.00	35.00
11/21/2014	Mark Adams	staff discussion of pending issues	0.1	350.00	35.00
Total					\$70.00
Payments/Credits					\$0.00
Balance Due					\$70.00



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Invoice

Invoice #: 4962
Invoice Date: 12/4/2014
Due Date: 12/4/2014
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
11/10/2014	Tyler Huxtable	Forward counsel invoice	0.1	75.00	7.50
11/13/2014	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	75.00	7.50
11/21/2014	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	75.00	7.50
Total					\$22.50
Payments/Credits					\$0.00
Balance Due					\$22.50



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Bdi Tq:

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Invoice

Invoice #: 5201

Invoice Date: 1/1/2015

Due Date: 1/1/2015

Terms: Due on receipt

Date	Service	Description	Hours	Rate	Amount
12/5/2014	Mark Adams	staff discussion re pending issues	0.1	350.00	35.00
12/12/2014	Mark Adams	staff discussion re pending issues including	0.2	350.00	70.00

Total	\$105.00
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Payments/Credits	\$0.00
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Balance Due	\$105.00
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Invoice

Invoice #: 5202

Invoice Date: 1/4/2015

Due Date: 1/4/2015

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
12/5/2014	Tyler Hundable	Staff discussion re pending issues and follow-up	0.1	75.00	7.50
12/12/2014	Tyler Hundable	Staff discussion of pending issues; follow-up thereof	0.1	75.00	7.50
Total					\$15.00
Payments/Credits					\$0.00
Balance Due					\$15.00



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BIN To:

Squirrels 29, Eureka

Invoice

Invoice #: 5203

Invoice Date: 1/8/2015

Due Date: 1/8/2015

Terma: Què es recepte

Date	Service	Description	Hours	Rate	Amount
12/30/2014	Andrew Adams	call with counsel re: trial	0.5	250.00	150.00

Total	\$150.00
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Payments/Credits	\$0.00
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Balance Due	\$150.00
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Invoice

Invoice #: 6204

Invoice Date: 1/8/2015

Due Date: 1/8/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
12/5/2014	ZSally Rowshan	Staff Meeting	0.1	300.00	30.00
12/12/2014	ZSally Rowshan	Staff Meeting	0.1	300.00	30.00
Total					\$60.00
Payments/Credits					\$0.00
Balance Due					\$60.00



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Invoice

Invoice #: 5433

Invoice Date: 2/1/2015

Due Date: 2/1/2015

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
1/5/2015	Mark Adams	staff discussion of pending issues	0.1	350.00	35.00
1/22/2015	Mark Adams	staff discussion re pending issues	0.1	350.00	35.00
1/28/2015	Mark Adams	review sign and have notarized 88 pendens	0.4	350.00	140.00
1/28/2015	Mark Adams	1/c Neal Lab re trial readiness conference and 1/c with AA	0.6	350.00	210.00
1/28/2015	Mark Adams	review recorded 118 pendens, prepare demand for squires title company	0.7	350.00	245.00
1/28/2015	Mark Adams	final arrangements and email demand to escrow	0.2	350.00	70.00
Total					\$735.00
Payments/Credits					\$0.00
Balance Due					\$735.00



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Invoice

Invoice #: 5434

Invoice Date: 2/4/2015

Due Date: 2/4/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
1/5/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	75.00	7.50
1/22/2015	Tyler Huxtable	Serve notice of Lis Pendens	0.4	75.00	30.00
1/22/2015	Tyler Huxtable	Staff discussion of pending issues and follow up	0.1	75.00	7.50
1/26/2015	Tyler Huxtable	Update certified mail service addresses, send amended lis pendens via certified mail, forward lis pendens for recording	0.5	75.00	37.50
1/29/2015	Tyler Huxtable	Archive letter from title company re demand	0.1	75.00	7.50

Total \$90.00

Payments/Credits \$0.00

Balance Due \$90.00



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Invoice

Invoice #: 5436

Invoice Date: 2/8/2015

Due Date: 2/8/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
1/9/2015	Andrew Adams	Draft lis pendens, notice of lis pendens	0.6	250.00	150.00
1/22/2015	Andrew Adams	Lis pendens prep, notice of recording of lis pendens	0.2	250.00	50.00
1/24/2015	Andrew Adams	Trial prep, timeline gather docs for Neal Latt	6.8	250.00	1,700.00
1/26/2015	Andrew Adams	Trial prep, call with counsel.	1.6	250.00	400.00
Total					\$2,300.00
Payments/Credits					\$0.00
Balance Due					\$2,300.00



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Invoice

Invoice #: 5436

Invoice Date: 2/8/2015

Due Date: 2/8/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
1/5/2015	ZSally Rowshan	Staff Meeting	0.1	300.00	30.00
1/22/2015	ZSally Rowshan	Staff Meeting	0.1	300.00	30.00
Total					\$60.00
Payments/Credits					\$0.00
Balance Due					\$60.00



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Invoice

Invoice #: 5671
Invoice Date: 3/1/2015
Due Date: 3/1/2015
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
2/2/2015	Mark Adams	review case chronology, email exchange with Neal Lab	0.3	350.00	105.00
2/3/2015	Mark Adams	staff discussion re pending issues	0.1	350.00	35.00
2/12/2015	Mark Adams	staff discussion of pending issues	0.2	350.00	70.00
2/26/2015	Mark Adams	staff discussion of pending issues	0.1	350.00	35.00
2/27/2015	Mark Adams	W/ bookkeeper and (W/ re pending cashflow issues	0.1	350.00	35.00
2/28/2015	Mark Adams	Gerald Feldman meeting re current funding issues	0.1	350.00	35.00
Total					\$315.00
Payments/Credits					\$0.00
Balance Due					\$315.00



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Invoice

Invoice #: 5672

Invoice Date: 3/4/2015

Due Date: 3/4/2015

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
2/2/2015	Tyler Huxtable	Forward signed Notice of Association to Neal Latt; archive case activity summary	0.3	75.00	22.50
2/3/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	75.00	7.50
2/3/2015	Tyler Huxtable	Research maturity date of note	0.1	75.00	7.50
2/6/2015	Tyler Huxtable	Circulate minute order and calendar conference	0.2	75.00	15.00
2/12/2015	Tyler Huxtable	Staff discussion re pending issues and follow up.	0.2	75.00	15.00
2/17/2015	Tyler Huxtable	Circulate recorded fir pendens	0.1	75.00	7.50
2/26/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	75.00	7.50
Total					\$82.50
Payments/Credits					\$0.00
Balance Due					\$82.50



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Invoice

Invoice #: 5673

Invoice Date: 3/8/2015

Due Date: 3/8/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
2/12/2015	Andrew Adams	Discusses next steps at property meeting. Get assignments	0.2	250.00	50.00
Total					\$50.00
Payments/Credits					\$0.00
Balance Due					\$50.00



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Invoice

Invoice #: 5674

Invoice Date: 3/8/2015

Due Date: 3/8/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
2/3/2015	ZBally Rowshan	Staff Meeting	0.1	300.00	30.00
Total					\$30.00
Payments/Credits					\$0.00
Balance Due					\$30.00



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Invoice

Invoice #: 5899

Invoice Date: 4/2/2015

Due Date: 4/2/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
3/5/2015	Andrew Adams	Staff discussion re pending issues and next steps	0.1	250.00	25.00
3/31/2015	Andrew Adams	Staff Meeting	0.1	250.00	25.00
4/2/2015	Andrew Adams	Research and draft Opp to Motion to Expunge	2.4	250.00	600.00
Total					\$650.00
Payments/Credits					\$0.00
Balance Due					\$650.00



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Invoice

Invoice #: 5700

Invoice Date: 4/2/2015

Due Date: 4/2/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
3/5/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	75.00	7.50
3/13/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	75.00	7.50
3/31/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	75.00	7.50
4/1/2015	Tyler Huxtable	Update calendar re Ex Parte on 4/13	0.1	75.00	7.50
Total					\$30.00
Payments/Credits					\$0.00
Balance Due					\$30.00



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Invoice

Invoice #: 5698

Invoice Date: 4/3/2015

Due Date: 4/3/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
3/6/2015	Mark Adams	staff discussion re pending issues	0.1	350.00	35.00
3/13/2015	Mark Adams	staff discussion re pending issues	0.1	350.00	35.00
3/19/2015	Mark Adams	to state bar investigator and to re-squires complaint	0.8	350.00	280.00
3/20/2015	Mark Adams	to bookkeeper re pending cll issues	0.1	350.00	35.00
3/31/2015	Mark Adams	Staff discussion re pending issues and follow up	0.1	350.00	35.00
4/2/2015	Mark Adams	conference call AA and Neal re lis pendens motion, fu	0.8	350.00	210.00
4/3/2015	Mark Adams	prepare ex parte lis pendens response, draft letter to state bar	4.8	350.00	1,610.00
Total					\$2,240.00
Payments/Credits					\$0.00
Balance Due					\$2,240.00



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Invoice

Invoice #: 6124

Invoice Date: 5/1/2015

Due Date: 5/1/2015

Terms: Due on receipt

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
4/4/2015	Mark Adams	complete and mail responses to squares state bar complaint	0.93333	350.00	326.67
4/4/2015	Mark Adams	review and edit opposition to ex parte re expungement	1.2	350.00	420.00
4/8/2015	Mark Adams	review second draft opposition re expungement	0.4	350.00	140.00
4/8/2015	Mark Adams	further editing of opposition, AA discussion re strategy	0.3	350.00	105.00
4/8/2015	Mark Adams	review and edit new draft of expungement opposition	0.6	350.00	210.00
4/8/2015	Mark Adams	Staff discussion re pending issues and follow up	0.2	350.00	70.00
4/8/2015	Mark Adams	calculate certificate payroll demand, email to fidelity title	0.7	350.00	245.00
4/9/2015	Mark Adams	l/c bookkeeper re pending c/f issues	0.1	350.00	35.00
4/20/2015	Mark Adams	Staff discussion re pending issues and follow up	0.1	350.00	35.00
4/20/2015	Mark Adams	file review, AA conversation, email exchange with Let re motion to expunge	0.4	350.00	140.00
4/27/2015	Mark Adams	Staff discussion re pending issues; follow up re same	0.1	350.00	35.00
4/27/2015	Mark Adams	l/c with bookkeeper re pending issues	0.1	350.00	35.00
Total					\$1,796.67
Payments/Credits					\$0.00
Balance Due					\$1,796.67



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Invoice

Invoice #: 6125

Invoice Date: 5/4/2015

Due Date: 5/4/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
4/8/2015	Tyler Huxtable	Coordinate opposition filing with MA and AA; forward signed opp to Neal Latt	0.4	75.00	30.00
4/8/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.2	75.00	15.00
4/9/2015	Tyler Huxtable	Set up CourtCall re 4/13 hearing	0.3	75.00	22.50
4/17/2015	Tyler Huxtable	Correspondence with Neal Latt re date of hearing	0.1	75.00	7.50
4/20/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	75.00	7.50
4/27/2015	Tyler Huxtable	Staff discussion re pending issues; follow up re same	0.1	75.00	7.50
Total					\$90.00
Payments/Credits					\$0.00
Balance Due					\$90.00



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Invoice

Invoice #: 8126

Invoice Date: 5/8/2015

Due Date: 5/8/2015

Terms: Due on receipt

Bill To:

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Date	Service	Description	Hours	Rate	Amount
4/5/2015	Andrew Adams	Opp to Motion to Expunge	1.4	250.00	350.00
4/6/2015	Andrew Adams	Opp to motion to expunge	1	250.00	250.00
4/6/2015	Andrew Adams	Opp to motion to expunge	0.4	250.00	100.00
4/6/2015	Andrew Adams	Staff Meeting	0.2	250.00	50.00
4/20/2015	Andrew Adams	Staff discussion re pending issues and follow up	0.1	250.00	25.00
4/27/2015	Andrew Adams	Staff discussion re pending issues; follow up re same	0.1	250.00	25.00
Total					\$800.00
Payments/Credits					\$0.00
Balance Due					\$800.00



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Bill To:

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Invoice

Invoice #: 6347

Invoice Date: 6/1/2015

Due Date: 6/1/2015

Terms: Due on receipt

Date	Service	Description	Hours	Rate	Amount
5/1/2015	Mark Adams	Staff discussion re pending issues and follow up	0.1	350.00	35.00
5/1/2015	Mark Adams	file review, amend jo matters and review documents re no refinancing of properties subject to the pending	0.3	350.00	105.00
5/7/2015	Mark Adams	Staff discussion re pending issues and follow up	0.1	350.00	35.00
5/14/2015	Mark Adams	to bookkeeper re pending of issues	0.1	350.00	35.00
5/26/2015	Mark Adams	Staff discussion re pending issues; follow-up re same	0.1	350.00	35.00
5/26/2015	Mark Adams	to bookkeeper re pending of issues	0.1	350.00	35.00
5/29/2015	Mark Adams	Staff discussion re pending issues	0.1	350.00	35.00
Total					\$315.00
Payments/Credits					\$0.00
Balance Due					\$315.00



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Invoice

Invoice #: 6348

Invoice Date: 6/4/2015

Due Date: 6/4/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/1/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	100.00	10.00
5/7/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	100.00	10.00
5/26/2015	Tyler Huxtable	Staff discussion re pending issues; follow-up re same	0.1	100.00	10.00
6/28/2015	Tyler Huxtable	Set up CourtCall for next hearing	0.2	100.00	20.00
Total					\$50.00
Payments/Credits					\$0.00
Balance Due					\$50.00



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Invoice

Invoice #: 6349

Invoice Date: 6/4/2015

Due Date: 6/4/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
5/1/2015	Erica Connelly	Property Meeting	0.1	80.00	8.00
5/7/2015	Erica Connelly	Property Meeting	0.1	80.00	8.00
5/26/2015	Erica Connelly	Staff discussion re: pending issues	0.1	80.00	8.00
5/29/2015	Erica Connelly	Staff discussion re: pending issues	0.1	80.00	8.00
Total					\$32.00
Payments/Credits					\$0.00
Balance Due					\$32.00



CALIFORNIA
RECEIVERSHIP
GROUP, LLC

2716 Ocean Park Blvd.
Suite 3010

310-471-8181

www.calreceivers.com

Invoice

Invoice #: 6350

Invoice Date: 6/8/2015

Due Date: 6/8/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
5/1/2015	Andrew Adams	Staff discussion re pending issues and follow up	0.1	250.00	25.00
5/7/2015	Andrew Adams	Staff discussion re pending issues and follow up	0.1	250.00	25.00
5/11/2015	Andrew Adams	Research/draft Opp to Motion to Expunge	1	250.00	250.00
5/12/2015	Andrew Adams	Opp to motion to expunge	0.2	250.00	50.00
5/28/2015	Andrew Adams	Staff discussion re pending issues; follow-up re same	0.1	250.00	25.00
5/29/2015	Andrew Adams	Staff discussion re: pending issues	0.1	250.00	25.00
Total					\$400.00
Payments/Credits					\$0.00
Balance Due					\$400.00



**CALIFORNIA
RECEIVERSHIP
GROUP, LLC**

2716 Ocean Park Blvd.
Suite 3010

310-471-8181

www.calreceivers.com

Invoice

Invoice #: 8539

Invoice Date: 7/1/2015

Due Date: 7/1/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/3/2015	Mark Adams	CourtCall appearance re motion to expunge, post hearing w/ Neal Labl	1.4	350.00	490.00
6/3/2015	Mark Adams	w/ bookkeeper re pending cll issues	0.1	350.00	35.00
6/5/2015	Mark Adams	Property meeting	0.1	350.00	35.00
6/8/2015	Mark Adams	f/u to state bar termination of aquires complaint re unpaid fees	0.4	350.00	140.00
6/11/2015	Mark Adams	Staff discussion re pending issues and follow up re same	0.2	350.00	70.00
6/12/2015	Mark Adams	w/ bookkeeper re pending cll issues	0.1	350.00	35.00
6/18/2015	Mark Adams	Staff discussion re pending issues and follow up of same	0.1	350.00	35.00
6/26/2015	Mark Adams	Discuss pending issues with staff and follow up re: same.	0.1	350.00	35.00
Total					\$675.00
Payments/Credits					\$0.00
Balance Due					\$675.00



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GROUP, LLC**

2716 Ocean Park Blvd.
Suite 3010

310-471-8181

www.calreceivers.com

Invoice

Invoice #: 6640

Invoice Date: 7/4/2015

Due Date: 7/4/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/18/2015	Marcy Wehde	Staff meeting re: c/s issues	0.1	100.00	10.00
6/28/2015	Marcy Wehde	Staff meeting re: c/s issues	0.1	100.00	10.00
Total					\$20.00
Payments/Credits					\$0.00
Balance Due					\$20.00



CALIFORNIA
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GROUP, LLC

2716 Ocean Park Blvd.
Suite 3010

310-471-8181

www.calreceivers.com

Invoice

Invoice #: 8641

Invoice Date: 7/4/2015

Due Date: 7/4/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/5/2015	Tyler Huxtable	Staff discussion re pending issues and follow up re same	0.1	100.00	10.00
6/11/2015	Tyler Huxtable	Staff discussion re pending issues and follow up re same	0.2	100.00	20.00
6/19/2015	Tyler Huxtable	Staff discussion re pending issues and follow up	0.1	100.00	10.00
6/26/2015	Tyler Huxtable	Staff discussion re pending issues and follow up re: same	0.1	100.00	10.00

Total \$50.00

Payments/Credits \$0.00

Balance Due \$50.00



**CALIFORNIA
RECEIVERSHIP
GROUP, LLC**

2718 Ocean Park Blvd.
Suite 3010

310-471-8181

www.calreceivers.com

Invoice

Invoice #: 6642

Invoice Date: 7/4/2015

Due Date: 7/4/2015

Terms: Due on receipt

Bill To:

Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/5/2015	Erica Connelly	Staff discussion re: pending issues	0.1	80.00	8.00
6/11/2015	Erica Connelly	Staff discussion re: pending issues	0.2	80.00	16.00
6/18/2015	Erica Connelly	Staff discussion re: pending issues	0.1	80.00	8.00
6/26/2015	Erica Connelly	Staff discussion re: pending issues	0.1	80.00	8.00
Total					\$40.00
Payments/Credits					\$0.00
Balance Due					\$40.00



CALIFORNIA
RECEIVERSHIP
GROUP, LLC

2716 Ocean Park Blvd.
Suite 3010

310-471-8181

www.calreceivers.com

Invoice

Invoice #: 6643

Invoice Date: 7/8/2015

Due Date: 7/8/2015

Terms: Due on receipt

Bill To:

Squares 29, Eureka

Date	Service	Description	Hours	Rate	Amount
6/3/2015	Andrew Adams	Prep for 6/3 hearing	0.3	250.00	75.00
6/3/2015	Andrew Adams	Attend hearing via CourtCall	0.4	250.00	100.00
6/5/2015	Andrew Adams	Staff discussion re pending issues and follow up re same	0.1	250.00	25.00
6/11/2015	Andrew Adams	Staff discussion re pending issues and follow up re same	0.2	250.00	50.00
6/18/2015	Andrew Adams	Staff discussion re pending issues and follow up	0.1	250.00	25.00
6/26/2015	Andrew Adams	Staff discussion re pending issues and follow up re same	0.1	250.00	25.00
Total					\$300.00
Payments/Credits					\$0.00
Balance Due					\$300.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, INC.

Invoice

2715 Ocean Park Blvd.
Suite 3010

310-471-8181
www.calreceivers.com

BILL To:
Squires 28, Eureka

Invoice #: 7118
Invoice Date: 8/1/2015
Due Date: 8/1/2015
Terms: Due on receipt

Date	Service	Description	Hours	Rate	Amount
7/22/2015	Mark Adams	Lender meeting re various pending bidding requests	0.1	350.00	35.00
7/24/2015	Mark Adams	email exchange with Andrew re: accommodations	0.1	350.00	35.00
7/28/2015	Mark Adams	review and follow up on email from Tyler re: change of firm name	0.1	350.00	35.00
Total					\$105.00
Payments/Credits					\$0.00
Balance Due					\$105.00



**CALIFORNIA
RECEIVERSHIP**
GROUP INC

Invoice

2716 Ocean Park Blvd.
Suite 3010

310-471-8161
www.calreceivers.com

Bill To:
Squires 29, Eureka

Invoice #: 7117
Invoice Date: 8/4/2015
Due Date: 8/4/2015
Terms: Due on receipt

Date	Service	Description	Hours	Rate	Amount
7/28/2015	Tyler Huchins	Circulate and archive change of firm name; update POS	0.2	100.00	20.00

Total \$20.00

Payments/Credits \$0.00

Balance Due \$20.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

150 South Barrington Avenue
Suite 100
310-471-8181
www.calreceivers.com

Invoice #: 7465
Invoice Date: 9/1/2015
Due Date: 9/1/2015
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
8/18/2015	Mark Adams	U/c AA re pending issues	0.2	350.00	70.00
8/26/2015	Mark Adams	Review and file on email exchange w/ Neal and Andrew re: witness list and new trial date.	0.1	350.00	35.00
Total					\$105.00
Payments/Credits					\$0.00
Balance Due					\$105.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

150 South Barrington Avenue
Suite 100
310-471-8181
www.calreceivers.com

Invoice #: 7455
Invoice Date: 8/4/2016
Due Date: 8/4/2016
Terms: Due on receipt

Billed To:
Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
8/27/2016	Tyler Hudabla	Calendar new trial dates	0.1	100.00	10.00
Total					\$10.00
Payments/Credits					\$0.00
Balance Due					\$10.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

150 South Barrington Avenue
Suite 100
310-471-8181
www.calcreceivers.com

Invoice

Invoice #: 7457
Invoice Date: 8/8/2015
Due Date: 8/8/2015
Terms: Due on receipt

BTM To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
8/18/2015	Andrew Adams	Call with Neal Left re strategy	1	250.00	250.00
8/19/2015	Andrew Adams	Call with AAA re trial prep	0.2	250.00	50.00
Total					\$300.00
Payments/Credits					50.00
Balance Due					\$300.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

150 South Barrington Avenue
Suite 100
310-471-8181
www.careceivers.com

Invoice #: 7745
Invoice Date: 10/1/2015
Due Date: 10/1/2015
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
9/10/2015	Mark Adams	Email exchange w/ Elizabeth re: funding.	0.1	350.00	35.00
9/11/2015	Mark Adams	Email exchange w/ Elizabeth re: funding.	0.1	350.00	35.00
9/13/2015	Mark Adams	tlc bookkeeper re pending off issues	0.1	350.00	35.00
Total					\$105.00
Payments/Credits					\$0.00
Balance Due					\$105.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

150 South Barrington Avenue
Suite 100
310-471-8181
www.calreceivers.com

Invoice #: 7746
Invoice Date: 10/4/2015
Due Date: 10/4/2015
Terms: Due on receipt

Bill To:
Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
9/26/2015	Tyler Hustable	Draft Change of Address form with new office information	0.1	100.00	10.00
Total					\$10.00
Payments/Credits					\$0.00
Balance Due					\$10.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

2716 Ocean Park Blvd.
Suite 3010
Santa Monica, CA 90405
310-471-8181
www.calreceivers.com

Invoice #: 8125
Invoice Date: 11/4/2015
Due Date: 11/4/2015
Terms: Due on receipt

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
10/2/2015	Tyler Huxtable	Prepare, file and serve Notice of Change of Address (Squires v Adams)	0.2	100.00	20.00
10/2/2015	Tyler Huxtable	Prepare, file and serve Notice of Change of Address	0.2	100.00	20.00
10/13/2015	Tyler Huxtable	Re-file Notice of Change of Address	0.2	100.00	20.00
Total					\$60.00
Payments/Credits					\$0.00
Balance Due					\$60.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

2716 Ocean Park Blvd.
Suite 3010
Santa Monica, CA 90405
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www.calreceivers.com

Invoice #: 8127
Invoice Date: 11/4/2015
Due Date: 11/4/2015
Terms: Due on receipt

BNI To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
10/2/2015	Natalia Delgadillo	Scan, copy, sign, serve and file notice of change of address form.	0.2	65.00	13.00
Total					\$13.00
Payments/Credits					\$0.00
Balance Due					\$13.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PRC

Invoice

2715 Ocean Park Blvd.
Suite 3010
Santa Monica, CA 90406
310-471-8181
www.calreceivers.com

Invoice #: 8488
Invoice Date: 12/1/2015
Due Date: 12/1/2015
Terms: Due on receipt

Bill To:
Squires 29, Eugene

Date	Service	Description	Hours	Rate	Amount
11/10/2015	Mark Adams	Email exchange w/ Neal Latt and Andrew re: readiness conference	0.1	350.00	35.00
11/23/2015	Mark Adams	Review and fix on email from Eddie re: notice of readiness conference (doo)	0.1	350.00	35.00
11/23/2015	Mark Adams	Meeting with targets re: outstanding issues	0.1	350.00	35.00
Total					\$105.00
Payments/Credits					\$0.00
Balance Due					\$105.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

2716 Ocean Park Blvd.
Suite 3010

310-471-8181
www.ccreceivers.com

BNI To:
Squires 29, Eureka

Invoice #: 8489
Invoice Date: 12/4/2015
Due Date: 12/4/2015
Terms: Due on receipt

Date	Service	Description	Hours	Rate	Amount
11/11/2015	Tyler Huntakin	Update trial and readiness conference dates	0.1	150.00	15.00
11/30/2015	Tyler Huntakin	Update calendar re upcoming hearing	0.1	150.00	15.00
Total					\$30.00
Payments/Credits					\$0.00
Balance Due					\$30.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

2716 Ocean Park Blvd.
Suite 3010
Santa Monica, CA 90405
310-471-8181
www.calreceivers.com

Invoice #: 10216
Invoice Date: 5/1/2016
Due Date: 5/1/2016

BRI To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
4/21/2016	Mark Adams	Meeting with AA and fu re: pending issues.	0.2	350.00	70.00
4/26/2016	Mark Adams	Email exchange w/ Mercy and Eddie re: title research and DOT.	0.1	350.00	35.00
4/27/2016	Mark Adams	Email exchange w/ Neal Latt re: continued hearing.	0.1	350.00	35.00
Total					\$140.00
Payments/Credits					\$0.00
Balance Due					\$140.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

2716 Ocean Park Blvd.
Suite 3010
Santa Monica, CA 90406
310-471-8181
www.calreceivers.com

Invoice #: 10217
Invoice Date: 5/4/2018
Due Date: 5/4/2018

Bill To:
Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
4/25/2018	Tyler Huxtable	Update calendar re continued trial	0.1	150.00	15.00
Total					\$15.00
Payments/Credits					\$0.00
Balance Due					\$15.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

Invoice #: 10215
Invoice Date: 6/4/2016
Due Date: 6/4/2016

2716 Ocean Park Blvd.
Suite 3010
Santa Monica, CA 90405
310-471-8181
www.calreceivers.com

BRI To:
Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
4/24/2016	Marcy Wehde	Emails re: recorded docs	0.1	150.00	15.00
Total					\$15.00
Payments/Credits					\$0.00
Balance Due					\$15.00



**CALIFORNIA
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Invoice

2716 Ocean Park Blvd.
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Invoice #: 10218
Invoice Date: 5/4/2016
Due Date: 6/4/2016

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
4/22/2016	Eddie Geo	Research deeds of trust and recorded document numbers.	0.3	80.00	24.00
4/26/2016	Eddie Geo	Research title, loan, and transaction history information for all involved properties.	2.3	80.00	184.00
Total					\$208.00
Payments/Credits					\$0.00
Balance Due					\$208.00



**CALIFORNIA
RECEIVERSHIP**
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Invoice

2716 Ocean Park Blvd.
Suite 3010
Santa Monica, CA 90405
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Invoice #: 10220
Invoice Date: 5/8/2018
Due Date: 5/8/2018

BILL TO:
Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
4/26/2018	Andrew Adams	Discuss next steps with MA	0.2	250.00	50.00
Total					\$50.00
Payments/Credits					\$0.00
Balance Due					\$50.00



**CALIFORNIA
RECEIVERSHIP**
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Invoice

2716 Ocean Park Blvd.
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Invoice #: 10592
Invoice Date: 5/1/2018
Due Date: 6/1/2018

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
5/12/2018	Mark Adams	Prep for and meeting with lenders re: pending issues.	0.2	\$350.00	70.00
Total					\$70.00
Payments/Credits					\$0.00
Balance Due					\$70.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

2716 Ocean Park Blvd.
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Santa Monica, CA 90405
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Invoice #: 10944
Invoice Date: 7/8/2016
Due Date: 7/8/2016

Bill To:

Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
6/15/2016	Andrew Adams	Trial prep, call with NL	0.4	250.00	100.00
Total					\$100.00
Payments/Credits					\$0.00
Balance Due					\$100.00



**CALIFORNIA
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Invoice

2716 Ocean Park Blvd.
Suite 3010
Santa Monica, CA 90405
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Invoice #: 11179
Invoice Date: 8/1/2016
Due Date: 8/1/2016

Bill To:
Squire 29, Eureka

Date	Service	Description	Hours	Rate	Amount
7/13/2016	Mark Adams	AA meeting and file re trial prep	0.7	350.00	245.00
7/13/2016	Mark Adams	1/c Neal Latt and file re trial prep	1.2	350.00	420.00
7/14/2016	Mark Adams	Email exchange with Andrew re: draft letter. Doc review and file.	0.3	350.00	105.00
7/17/2016	Mark Adams	Email review and file with Andrew re: opening statement for 7/18/16 hearing. Doc review.	0.3	350.00	105.00
7/18/2016	Mark Adams	1/c AA re trial, file research on other cases where minute order preceded appointment	1.3	350.00	455.00
Total					\$1,330.00
Payments/Credits					\$0.00
Balance Due					\$1,330.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

2716 Ocean Park Blvd.
Suite 3010
Santa Monica, CA 90405
310-471-8181
www.calreceivers.com

Invoice #: 11180
Invoice Date: 8/4/2018
Due Date: 8/4/2018

BH To:
Squires 28, Eureka

Date	Service	Description	Hours	Rate	Amount
7/12/2018	Tyler Huotable	Update calendar re trial readiness hearing	0.1	150.00	15.00
7/13/2018	Tyler Huotable	Locate all case files and boxes; recall boxes from file storage company for A Adams	0.3	150.00	45.00
7/19/2018	Tyler Huotable	Research various appeals dockets for A Adams re Squires' appeal of Order Appointing Receiver	0.5	150.00	75.00
7/21/2018	Tyler Huotable	Book flight for A Adams return from Eureka	0.4	150.00	60.00
Total					\$195.00
Payments/Credits					\$0.00
Balance Due					\$195.00



**CALIFORNIA
RECEIVERSHIP**
GROUP, PBC

Invoice

2716 Ocean Park Blvd.
Suite 3010
Santa Monica, CA 90405
310-471-8181
www.calreceivers.com

Invoice #: 11181
Invoice Date: 8/8/2016
Due Date: 8/8/2016

Bill To:
Squires 29, Eureka

Date	Service	Description	Hours	Rate	Amount
7/11/2016	Andrew Adams	Trial prep	0.9	250.00	125.00
7/12/2016	Andrew Adams	Trial prep, review notes and timeline	1	250.00	250.00
7/13/2016	Andrew Adams	Trial prep	1.4	250.00	350.00
7/13/2016	Andrew Adams	Trial prep	1.1	250.00	275.00
7/13/2016	Andrew Adams	Trial prep, review docs, Letter samples	0.3	250.00	75.00
7/13/2016	Andrew Adams	Trial prep	0.3	250.00	75.00
7/16/2016	Andrew Adams	Prep jury instructions, research.	2.5	250.00	625.00
7/17/2016	Andrew Adams	Travel and trial prep.	8	250.00	2,000.00
7/18/2016	Andrew Adams	Trial, jury vote dir.	8	250.00	1,250.00
7/18/2016	Andrew Adams	Trial prep.	1.2	250.00	300.00
7/19/2016	Andrew Adams	Trial.	12	250.00	3,000.00
7/20/2016	Andrew Adams	Prep for, attend trial. Testify, cross, etc. Review notes for next day	10	250.00	2,500.00
7/21/2016	Andrew Adams	Trial, closing arguments, rebuttal testimony. Jury instructions. Travel back from Eureka	14	250.00	3,500.00
7/23/2016	Andrew Adams	Draft Motion for fee order.	3.5	250.00	875.00
7/25/2016	Andrew Adams	Time billed, prep for fee motion	0.2	250.00	50.00
Total					\$15,250.00
Payments/Credits					\$0.00
Balance Due					\$15,250.00

Exhibit 7

10:46 AM
08/08/18
Cash Basis

Mark Adams - Receivership Accounts
Profit & Loss by Receivership
All Transactions

	<u>Squires 28</u>	<u>TOTAL</u>
Ordinary Income/Expense		
Income		
Advance from Receiver	18,994.71	18,994.71
Lender-BF	7,500.00	7,500.00
Lender-YF	7,500.00	7,500.00
Total Income	<u>33,994.71</u>	<u>33,994.71</u>
Gross Profit	33,994.71	33,994.71
Expense		
Bond	1,000.00	1,000.00
Court Fees	2,643.00	2,643.00
Legal Fees	20,466.87	20,466.87
Loch Fees	450.00	450.00
Postage and Delivery	130.03	130.03
Printing and Reproduction	103.22	103.22
Professional Fees	100.00	100.00
Receiver Fees	5,200.00	5,200.00
Receivership Expense	19.00	19.00
Recording/Filing Fees	125.00	125.00
Travel Expenses	3,710.53	3,710.53
Total Expense	<u>33,937.65</u>	<u>33,937.65</u>
Net Ordinary Income	<u>57.06</u>	<u>57.06</u>
Net Income	<u>57.06</u>	<u>57.06</u>

10:44 AM
08/09/18
Cash Basis

Mark Adams - Receivership Accounts
Profit & Loss Detail
All Transactions

Type	Date	Num	Name	Memo	Class	Paid Amount
Advance from Receiver						
General Jo...	01/25/2011	202			Squires 29	704.10
General Jo...	03/16/2011	205			Squires 29	1,387.82
General Jo...	03/17/2011	195		travel expenses for hearing	Squires 29	281.00
Deposit	03/21/2011			open checking account	Squires 29	100.00
General Jo...	10/18/2011	249			Squires 29	78.00
Deposit	10/21/2011		Mark Adams Attorne...	UB CHECKING TRANSFER 1...	Squires 29	1,019.81
General Jo...	12/08/2011	274			Squires 29	78.00
General Jo...	01/05/2012	287			Squires 29	78.00
General Jo...	02/15/2012	305		Reimbursement to A Adams	Squires 29	318.00
General Jo...	02/22/2012	308			Squires 29	108.00
General Jo...	05/25/2012	347			Squires 29	78.00
Deposit	07/03/2012		Mark Adams Attorne...	Deposit	Squires 29	1,185.00
General Jo...	07/18/2012	380			Squires 29	78.00
General Jo...	08/27/2012	386			Squires 29	78.00
General Jo...	06/17/2013	472			Squires 29	78.00
General Jo...	08/19/2013	849			Squires 29	85.00
General Jo...	09/27/2013	524		FedEx	Squires 29	123.12
General Jo...	10/01/2013	522			Squires 29	33.22
General Jo...	10/03/2013	526			Squires 29	88.00
General Jo...	10/31/2013	544			Squires 29	116.00
General Jo...	11/01/2013	545		Professional Photocopy	Squires 29	40.00
General Jo...	12/03/2013	569			Squires 29	88.00
General Jo...	12/18/2013	574			Squires 29	88.00
Deposit	01/22/2014		Mark Adams Attorne...	UB CHECKING TRANSFER 1...	Squires 29	80.00
General Jo...	01/30/2014	595			Squires 29	88.00
General Jo...	02/13/2014	602			Squires 29	100.00
General Jo...	02/27/2014	607			Squires 29	86.00
General Jo...	04/22/2014	850			Squires 29	86.00
Check	06/02/2014	3	Mark Adams Attorne...		Squires 29	-6,742.87
General Jo...	06/04/2014	874			Squires 29	86.00
Deposit	10/09/2014		Mark Adams Attorne...	Deposit	Squires 29	2,000.00
Deposit	11/05/2014		Mark Adams Attorne...	Deposit	Squires 29	2,000.00
Deposit	12/17/2014		Mark Adams Attorne...	Deposit	Squires 29	2,500.00
General Jo...	02/02/2015	252			Squires 29	8.91
Deposit	02/19/2015		Mark Adams Attorne ..	Deposit	Squires 29	535.00
Deposit	03/30/2015		Mark Adams Attorne...	Deposit	Squires 29	4,570.00
General Jo...	05/29/2015	350			Squires 29	88.00
Deposit	08/08/2015		Mark Adams Attorne...	Deposit	Squires 29	2,478.59
Deposit	07/09/2015		Mark Adams Attorne ..	Deposit	Squires 29	800.00
Deposit	08/12/2015		Mark Adams Attorne...	Deposit	Squires 29	800.00
Deposit	12/28/2015		Mark Adams Attorne...	Deposit	Squires 29	2,054.21
Deposit	02/29/2016		Mark Adams Attorne...	Deposit	Squires 29	180.00
Deposit	07/14/2016		Mark Adams Attorne...	Deposit	Squires 29	1,100.00
Total Advance from Receiver						18,984.71
Lender-GF						
Deposit	05/27/2014		G&G Capital, LLC	Sunset LOC	Squires 29	7,500.00
Total Lender-GF						7,500.00
Lender-YF						
Deposit	05/27/2014		Bunig Enterprises	Sunset LOC	Squires 29	7,500.00
Total Lender-YF						7,500.00
Bond						
Check	07/07/2014	onfi...	Bond Services of Cal...	BOND SERVICES-CABILL PY...	Squires 29	-1,000.00
Total Bond						-1,000.00
Court Fees						
General Jo...	10/18/2011	249			Squires 29	-78.00

Page 1

10:44 AM
05/09/18
Cash Basis

Mark Adams - Receivership Accounts
Profit & Loss Detail
All Transactions

Type	Date	Num	Name	Memo	Class	Paid Amount
General Jo...	12/08/2011	274			Squires 29	-78.00
General Jo...	01/06/2012	287			Squires 29	-78.00
General Jo...	02/22/2012	308			Squires 29	-108.00
General Jo...	05/25/2012	347			Squires 29	-78.00
Check	07/03/2012	182	Humboldt Superior C...		Squires 29	-1,185.00
General Jo...	07/19/2012	360			Squires 29	-78.00
General Jo...	09/27/2012	388			Squires 29	-78.00
General Jo...	09/17/2013	472			Squires 29	-78.00
General Jo...	10/03/2013	528			Squires 29	-88.00
General Jo...	10/31/2013	544			Squires 29	-116.00
General Jo...	12/03/2013	569			Squires 29	-86.00
General Jo...	12/16/2013	574			Squires 29	-86.00
General Jo...	01/30/2014	598			Squires 29	-86.00
General Jo...	02/27/2014	607			Squires 29	-86.00
General Jo...	04/22/2014	650			Squires 29	-86.00
General Jo...	06/04/2014	674			Squires 29	-86.00
General Jo...	05/29/2015	350			Squires 29	-86.00
Total Court Fees						-2,843.00
Legal Fees						
Check	07/07/2014	onli...	Matthews, Kluck Wal...		Squires 29	-1,360.00
Check	10/09/2014	106	Matthews, Kluck Wal...	Partial Invoice 31923	Squires 29	-2,000.00
Check	11/05/2014	107	Matthews, Kluck Wal...	Inv 34889	Squires 29	-2,000.00
Check	12/17/2014	108	Matthews, Kluck Wal...	Invoice 37062 in full	Squires 29	-2,748.18
Check	02/19/2015	109	Matthews, Kluck Wal...	Invoice 37820	Squires 29	-535.00
Check	03/30/2015	110	Matthews, Kluck Wal...	Invoice 39484	Squires 29	-4,570.00
Check	06/08/2015	111	Matthews, Kluck Wal...	Invoice 42857	Squires 29	-2,476.69
Check	07/09/2015	112	Matthews, Kluck Wal...	Invoice 43836	Squires 29	-800.00
Check	08/12/2015	113	Matthews, Kluck Wal...	Invoice 45008	Squires 29	-800.00
Check	12/28/2015	114	Matthews, Kluck Wal...	Inv 48063, 47804, 48851, 50103	Squires 29	-2,054.21
Check	02/29/2016	115	Matthews, Kluck Wal...	Inv 52878	Squires 29	-270.21
Check	07/14/2016	116	Matthews, Kluck Wal...	Inv 75248; fees through 6/30/16	Squires 29	-1,044.87
Total Legal Fees						-20,456.87
Loan Fees						
Check	08/13/2014	104	G&G Capital, LLC		Squires 29	-225.00
Check	08/13/2014	105	Bunja Enterprises		Squires 29	-225.00
Total Loan Fees						-450.00
Postage and Delivery						
General Jo...	08/27/2013	524		FedEx	Squires 29	-34.44
General Jo...	09/27/2013	524		FedEx	Squires 29	-89.68
General Jo...	02/02/2015	252			Squires 29	-6.81
Total Postage and Delivery						-130.93
Printing and Reproduction						
General Jo...	10/01/2013	522			Squires 29	-33.22
General Jo...	11/01/2013	545		Professional Photocopy	Squires 29	-40.00
Check	02/10/2014	102	Professional Photoc...		Squires 29	-30.00
Total Printing and Reproduction						-103.22
Professional Fees						
General Jo...	02/13/2014	802			Squires 29	-100.00
Total Professional Fees						-100.00
Receiver Fees						
Check	09/02/2014	2	Mark Adams Attorne...		Squires 29	-5,200.00

10:44 AM
08/08/18
Cash Basis

Mark Adams - Receivership Accounts
Profit & Loss Detail
All Transactions

Type	Date	Num	Name	Memo	Class	Paid Amount
Total Receiver Fees						-5,200.00
Receivership Expenses						
Check	03/29/2011	1	Union Bank		Squires 29	-19.00
Total Receivership Expense						-19.00
Recording/Filing Fees						
General Jo...	06/19/2013	849			Squires 29	-85.00
Check	01/23/2014	193	Humboldt County Re...		Squires 29	-40.00
Total Recording/Filing Fees						-125.00
Travel Expenses						
General Jo...	01/25/2011	202			Squires 29	-704.10
General Jo...	03/16/2011	205			Squires 29	-1,387.82
General Jo...	03/17/2011	195		travel expenses for hearing	Squires 29	-281.00
Check	10/21/2011	191	Andrew Adams		Squires 29	-1,019.81
General Jo...	02/15/2012	305		Reimbursement to A Adams	Squires 29	-318.00
Total Travel Expenses						-3,710.53
TOTAL						57.06

Exhibit 8

Madhews, Kluck Walsh, & Wykle, LLP
100 M Street
Eureka, CA 95501
(707) 442-3758

California Receivership Group
c/o Andrew Adams
2716 Ocean Park Blvd. Suite 3010
Santa Monica, CA 90405

July 29, 2016

NL14-12011.....v. Squires
Bill No. 76074

Fees:			Hours	
05/16/14	NGL	Phone conference with Andrew Adams re: case facts	0.30	\$60.00
05/16/14	NGL	2nd Phone conference with Adams to confirm participation	0.10	\$20.00
05/16/14	NGL	Print and collate pleadings; Review file	0.70	\$140.00
05/18/14	NGL	Review pleadings to date	1.40	\$280.00
05/19/14	NGL	Email to Huxtable re: request for missing pleadings; Review pleadings in preparation for mediation conference; Conference with clients re: mediation strategy	2.00	\$400.00
05/20/14	NGL	Attend mandatory settlement conference with Carlton Floyd; Conference call with clients following settlement conference; Settlement offer call to Carlton Floyd	1.20	\$240.00
05/21/14	NGL	Print and collate 2nd Amended Complaint and related documents	0.30	\$60.00
05/21/14	NGL	2 Phone calls with Carlton Floyd re: settlement offers; Phone conference with Mark re: reaction to initial offer, new offer, case strategy	0.80	\$160.00

06/02/14	NGL	Emails to Andrew Re: Ex Parte Motion for Attorney fees	0.50	\$100.00
06/03/14	NGL	Phone conference with client Re: timing of Ex Parte Motion for \$25K in additional fees	0.50	\$100.00
06/09/14	NGL	Email to Mark Re: beginning Ex Parte Motion draft	0.10	\$20.00
06/09/14	NGL	Review 2nd Amended Complaint and attachments as background for draft of Motion	0.40	\$80.00
06/10/14	NGL	Continue trial prep of 9/28/11 ruling language	1.00	\$200.00
06/10/14	NGL	Trial prep review of receivership law	2.50	\$500.00
06/10/14	NGL	Begin Motion to Retain Counsel	1.20	\$240.00
06/11/14	NGL	Continue draft of Motion to Retain Counsel	3.00	\$600.00
06/12/14	NGL	Phone conference with clients to discuss trial strategy	2.00	\$400.00
06/12/14	NGL	Continue Motion for Outside Counsel	0.50	\$100.00
06/13/14	NGL	Review of docs emailed by client	0.30	\$60.00
06/13/14	NGL	Continue draft of Motion to Retain Counsel	0.70	\$140.00
06/16/14	NGL	Prep witness list for readiness hearing	0.30	\$60.00
06/16/14	NGL	Order background checks of named Plaintiffs to call as witnesses	0.30	\$60.00
06/16/14	NGL	Phone conference with Brian Gervin Re: availability to testify	0.20	\$40.00
06/16/14	NGL	Review local rules of Court Re: jury trial requests	1.00	\$200.00
06/16/14	NGL	Attend Trial Readiness Hearing	1.00	\$200.00

06/16/14	NGL	Request documents from client for trial prep	0.20	\$40.00
06/16/14	NGL	Prep Declaration for Motion to Hire Counsel	1.00	\$200.00
06/17/14	NGL	Complete application to hire Attorney with Declaration	3.00	\$600.00
06/17/14	NGL	Draft Proposed Order	0.70	\$140.00
06/17/14	NGL	Prepare email to client	0.40	\$80.00
06/17/14	NGL	Continue research for trial	1.00	\$200.00
06/18/14	NGL	Review and respond to client email Re: Ex Parte application review	0.40	\$80.00
06/19/14	NGL	Draft Declaration of Notice of Application	0.60	\$120.00
06/19/14	NGL	Phone conference with to client B. Floyd Re: Notice	0.20	\$40.00
06/19/14	NGL	Prepare email to client	0.50	\$100.00
06/23/14	NGL	Review and respond to emails from Client	0.40	\$80.00
06/23/14	NGL	Review B. Floyd opposition to Ex Parte application and its attachments	1.00	\$200.00
06/23/14	NGL	Email to Gerving Re: proposed sit-down	0.20	\$40.00
06/23/14	NGL	Prepare notes for drive-by of subject properties	0.40	\$80.00
06/26/14	NGL	Review complaint in prep for meeting with Brian Gerving	0.20	\$40.00
06/26/14	NGL	Interview Brian Gerving to prepare strategy for trial	2.30	\$460.00
06/26/14	NGL	Prepare email to Cliff Hart Re: Squires background checks	0.20	\$40.00
06/26/14	NGL	Review 2013 interim ruling and Order in	0.50	\$100.00

		receivership cases		
06/30/14	NGL	Court Appearance- Readiness Conference	1.00	\$200.00
06/30/14	NGL	Prepare email to Clients Re: trial date Review responses	0.40	\$80.00
06/30/14	NGL	Draft Notice to Appear at trial for 8 plaintiffs	0.50	\$100.00
06/30/14	NGL	Prepare email to investigator Re: new trial date for background checks	0.20	\$40.00
07/01/14	NGL	Prepare email to Cliff Hart Re: temporary Suspension of background checks	0.30	\$60.00
09/12/14	NGL	Prepare email to and Review email from Client Re: Orders on Motions	0.10	\$20.00
09/12/14	NGL	Review 2 Orders forwarded by Client	0.30	\$60.00
09/24/14	NGL	Review Email from Client Re: possible Floyd DQ threat from City of Eureka	0.30	\$60.00
09/24/14	NGL	Review email from Client Re: DQ strategy	0.20	\$40.00
11/26/14	NGL	Review email from Clients Re: City's successful appeal decision Review text of appeal decision Prepare email to (X2) Client's Re: expert witnesses	0.50	\$100.00
12/03/14	NGL	Review email from Mark Adams Re: Squires refinanced attempt	0.20	\$40.00
12/11/14	NGL	Complete reading of Squires vs City appellate decision	0.20	\$40.00
12/11/14	NGL	Conference with LAK Re: trial strategy	0.40	\$80.00
12/11/14	LAK	Review appellate Court Appearance- Ruling in Squire vs. City of Eureka	0.50	\$175.00

12/30/14	NGL	Conference with Law firm to discuss strategy for trial scheduled for 2/2/15	0.20	\$40.00
12/30/14	NGL	Phone conference with Andrew Re: trial strategy	0.80	\$160.00
01/06/15	NGL	Review email from Andrew Re: proposed 26 Lis Pendens Conference with associates on advisability and time estimates to do Humboldt County Sheriff's Office	0.50	\$100.00
01/12/15	NGL	Prepare email to Andrew Re: Liz Pendens	0.20	\$40.00
01/12/15	NGL	Review file in prep for trial scheduled to begin Feb. 2	0.70	\$140.00
01/12/15	NGL	Draft direct and Cross-Complaint examination questions	0.20	\$40.00
01/13/15	NGL	Review email from and Prepare email to Andrew Re: potential scheduling conflict on 2/6/15	0.20	\$40.00
01/14/15	NGL	Trial Prep- review jury instructions to ascertain elements required to prove cause of action brought by defendants	1.80	\$360.00
01/14/15	NGL	Begin drafts of "Contentions to Dispute" and "Contentions to Establish" worksheets	0.50	\$100.00
01/15/15	NGL	Trial Prep contention to establish/dispute voir dire questions, exhibit prep, opening statement	3.20	\$640.00
01/16/15	NGL	Continue Trial Prep Prepare worksheet on possible affirmative defenses	0.50	\$100.00
01/20/15	NGL	Trial Prep	2.50	\$500.00
01/22/15	NGL	Prepare notices to Appear for plaintiff's civil subpoena for Brian Gerving dispatch with Proof of Service's	1.50	\$300.00

01/22/15	NGL	Prepare email to and Review email from Client Re: Lis Pendens, trial conflict dates 2/6 and 2/9	0.30	\$60.00
01/22/15	NGL	Review Lis Pendens previously filed by our firm for reference	0.20	\$40.00
01/22/15	NGL	Review pleadings, court orders as background for trial	1.00	\$200.00
01/23/15	NGL	Review Lis Pendens prepared by Client and notice of Lis Pendens Review statutory requirements	0.50	\$100.00
01/23/15	NGL	Phone conference to County Recorder to inquire about recordability of document over-nighted by Clients	0.20	\$40.00
01/23/15	NGL	Phone conference to T. Huxtable Re: issues to sure defective Lis Pendens	0.20	\$40.00
01/23/15	NGL	Prepare email to Andrew Tyler with instructions on how to cure defective Lis Pendens with attached sample	0.30	\$60.00
01/23/15	NGL	Phone conference with Andrew Re: Lis Pendens/Trial strategy	0.80	\$160.00
01/26/15	NGL	Prepare email to Andrew & Tyler Re: certified copy of appellate court ruling	0.20	\$40.00
01/26/15	NGL	Edit amended Lis Pendens and exhibit A Return to Clients	0.80	\$160.00
01/26/15	NGL	Phone conference with Andrew Re: edits to Lis Pendens, trial strategy and actual entries into tenants units	0.80	\$160.00
01/26/15	NGL	Review email from Andrew Re: timeline, Ex Parte Motion precedents for justification defense	0.50	\$100.00
01/26/15	NGL	Court Appearance- Trial readiness	1.00	\$200.00

01/26/15	NGL	Phone conference with Mark and Andrew Re: post-trial readiness strategy forward	0.50	\$100.00
01/26/15	NGL	Prepare email to Brian Gervig Re: trial continued to 8/24	0.20	\$40.00
01/26/15	NGL	Complete notes for justification defense	0.50	\$100.00
01/27/15	NGL	Prepare email to and Review email from Mark Re: inquiry from Fidelity about release of Deed of Trust	0.20	\$40.00
01/27/15	NGL	Review all attachments, timeline, email chains, etc. sent by AA for Trial prep Put CRG files to sleep	1.00	\$200.00
01/28/15	NGL	Review recorded Lis Pendens for compliance Prepare email to and Review email from Mark Dispatch register of Actions obtained from court clerk for DR110040 & DR110803	0.70	\$140.00
01/29/15	NGL	Review email from Mark Re: reply to Fidelity National with terms demanded for release of Squires Lien	0.20	\$40.00
01/29/15	NGL	Prepare email to Mark Re: Notice of Association of counsel for City vs. Squires	0.20	\$40.00
02/02/15	NGL	Prepare email to Client Re: chronology obtained for DR110040 City vs. Squires	0.20	\$40.00
02/05/15	NGL	Prepare email to Humboldt Investigation Re: bill out work performed to date	0.20	\$40.00
02/05/15	NGL	Draft Proof of Service for Association of Counsel, file with court & dispatch to counsels	0.40	\$80.00
02/10/15	NGL	Prepare email to Client Re: fire at 117 5th Street, our plaintiff badly burned	0.20	\$40.00
02/26/15	NGL	Review email from and Prepare email to Mark Re: return of Lis Pendens service on Floyd	0.20	\$40.00

Squires

04/01/15	NGL	Review application for Order Shortening Time Review email from Andrew Re: Lis Pendens hearing	0.30	\$60.00
04/01/15	NGL	Review Motion for Expunge Lis Pendens Prepare email to Client Re: Conference call	0.50	\$100.00
04/02/15	NGL	Conference with firm Re: defensibility of Lis Pendens for Client's situation Review pleadings	0.30	\$60.00
04/02/15	NGL	Conference with Client Re: strategy for expungement hearing	0.90	\$180.00
04/03/15	NGL	Review email from and Prepare email to Mark Re: Lis Pendens on all Squires properties, question of former challenge by Squires	0.40	\$80.00
04/03/15	NGL	Prepare recorded Lis Pendens Proof of Service for court filing, file and serve on B. Floyd, Pucci, MacNevin	0.60	\$120.00
04/03/15	NGL	Review email from and Prepare email to Client Re: exhibits for rebuttal to Squires, State Bar complaint	0.40	\$80.00
04/03/15	NGL	Prepare email to Client Re: service of Lis Pendens on Brad Floyd	0.30	\$60.00
04/05/15	NGL	Review email from and Prepare email to Mark Re: need to oppose Brad's application for order shortening time Release of Deed of Trust	0.30	\$60.00
04/05/15	NGL	Review and edit Client's opposition to Motion to Expunge and attached Declaration	1.60	\$320.00
04/06/15	NGL	Prepare notes for Oral Agreement for 4/13 Motion to Expunge hearing	0.20	\$40.00

04/08/15	NGL	Review email from and Prepare email to Client's Re: possible prohibitions on borrowing/sale of properties in receivership	0.20	\$40.00
04/08/15	NGL	File opposition brief and associated docs Draft Proof of Service Serve on properties	0.50	\$100.00
04/09/15	NGL	Review email from Mark to Danielle Simon clarifying CRG payoff demand for Receiver's Certificate	0.20	\$40.00
04/14/15	NGL	Prepare email to and Review email from Brad Floyd Re: absence of Motion to expunge hearing on 4/13 court calendar	0.30	\$60.00
04/14/15	NGL	Prepare email to Clients Re: use of revised payoff demand email at Motion hearing	0.30	\$60.00
04/14/15	NGL	Review pleadings exhibits in preparation for Motion to expunge hearing Prepare oral argument notes	1.50	\$300.00
04/14/15	NGL	Prepare email to Brad Floyd with revised payoff demand for Deed of Trust Demand to withdraw Motion to Expunge	0.50	\$100.00
04/20/15	NGL	Prepare email to and Review email from Tyler Re: notice for rescheduled Motion to Expunge Lis Pendens hearing	0.20	\$40.00
05/01/15	NGL	Prepare email to Brad Floyd Re: future intentions for Motion to Expunge Lis Pendens	0.20	\$40.00
05/06/15	NGL	Review Re-filed Motion to Expunge Forward to Clients with questions	0.40	\$80.00
05/12/15	NGL	Skim revised opposition brief Prepare email to and Review email from Andrew Re: brief	0.30	\$60.00
05/20/15	NGL	Review pleadings Re: 2nd motion to expunge lis	2.50	\$500.00

		pendens, edit and prepare notes for oral argument file		
05/28/15	NGL	First review of reply to our opposition to Motion for Lis Pendens	0.30	\$60.00
05/28/15	NGL	Prepare email to Clients Re: reply brief	0.30	\$60.00
06/03/15	NGL	Prepare Oral Argument for Motion to Expunge hearing Review notes from pleadings	1.60	\$320.00
06/03/15	NGL	Court Appearance- Motion to Expunge hearing	1.00	\$200.00
06/03/15	NGL	Post Hearing Conference call with Clients	0.40	\$80.00
07/06/15	NGL	Draft Pucci Subpoena Forward to Clients with explanatory email	0.50	\$100.00
07/08/15	NGL	Prepare entail to Pucci with service of subpoena, consent and acknowledgment of receipt	0.40	\$80.00
07/08/15	NGL	Draft Pucci consent/acknowledgment	0.40	\$80.00
07/08/15	NGL	Complete Proof of Service of Civil subpoena for Pucci, following receipt of executed consent	0.20	\$40.00
08/05/15	NGL	Research local court rules for late deposit of jury fees File deposit of fees	0.50	\$100.00
08/05/15	NGL	Review email from and Prepare email to Dean Pucci Re: Conference Call	0.20	\$40.00
08/17/15	KMW	Court Appearance- Trial Readiness Memo to staff	1.00	\$300.00
08/18/15	NGL	Preparation of notes and questions for Conference with Dean Pucci	0.30	\$60.00
08/18/15	NGL	Conference with Pucci Re: anticipated scope of trial testimony, issues	0.80	\$160.00

08/18/15	NGL	Continue file Review germane to discussion with Pucci	0.30	\$60.00
08/18/15	NGL	2nd Phone conference with Pucci Re: dates ruling received; proposed Order received by court	0.20	\$40.00
08/18/15	NGL	Compare and contrast language of Pucci; proposed Order with Court Order filed Oct. 28, 2011	0.50	\$100.00
08/18/15	NGL	Phone conference with Andrew Re: trial strategy Phone conference with Pucci	1.40	\$280.00
08/24/15	NGL	Print out emails forwarded by Andrew 8/18 quickly Review	0.30	\$60.00
08/26/15	NGL	Court Appearance- Readiness Conference	1.00	\$200.00
08/26/15	NGL	Prepare email to Clients Re: new trial dates	0.30	\$60.00
08/27/15	NGL	Prepare email to Pucci releasing from trial appearance redraft new Subpoena for Gervins	0.40	\$80.00
08/27/15	NGL	Legal research Re: current witness fees per day of court for public employees, edit Gervins subpoena	0.40	\$80.00
10/09/15	NGL	Prepare email to Clients Re: likely continuation of 11/16 trial into 2016	0.20	\$40.00
11/09/15	NGL	Court Appearance- Trial readiness hearing	1.00	\$200.00
11/09/15	NGL	Prepare email to Client Re: calendaring of new trial date	0.20	\$40.00
02/04/16	NGL	Re-issue Gervins subpoena Prepare email to Gervins with details	0.50	\$100.00
04/11/16	NGL	Review email from and Prepare email to Clients Re: trial trespassing signs, written discovery	0.30	\$60.00

04/24/16	NGL	Trial: Prep file Review Draft closing argument	1.90	\$380.00
04/25/16	NGL	Court Appearance- Trial Readiness	1.00	\$200.00
04/25/16	NGL	Prepare email to Clients, Gerving Re: new trial dates, etc. Draft and serve new Gerving Subpoena	0.50	\$100.00
04/26/16	NGL	Review email from and Prepare email to Mark Re: travel plans, trial testimony	0.20	\$40.00
06/14/16	NGL	Review email from and Prepare email to Client Re: trial schedule	0.20	\$40.00
06/15/16	NGL	Phone conference with Andrew Re: trial strategy	0.50	\$100.00
06/15/16	NGL	Prep notes of conversation	0.20	\$40.00
07/11/16	KMW	Court Appearance- Trial Readiness	1.00	\$300.00
07/11/16	KMW	Prepare email to Clients and Gerving Re: trial confirmation	0.30	\$90.00
07/11/16	NGL	Phone conference with Andrew Re: trial strategy development	0.50	\$100.00
07/12/16	NGL	Review Andrew's timeline Review case file	0.30	\$60.00
07/13/16	NGL	Review file AA timeline prepare questions for Phone conference with Andrew	1.50	\$300.00
07/13/16	NGL	Phone conference with Andrew Re: trial prep	1.40	\$280.00
07/13/16	NGL	Trial Prep	2.60	\$520.00
07/13/16	NGL	Phone conference with Mark Adams Re: "ruling" vs "Order"; trial strategy Motions to Limine	1.00	\$200.00
07/14/16	NGL	Trial prep	0.80	\$160.00

		Exhibit prep		
07/16/16	NGL	Trial Prep	4.30	\$860.00
07/17/16	NGL	Trial Prep	6.30	\$1,260.00
07/18/16	NGL	Court Appearance- Jury trial (jury selection)	3.80	\$760.00
07/18/16	NGL	Trial Prep- cross examination questions Preparation of exhibits for Gerving testimony	8.30	\$1,660.00
07/19/16	NGL	Court Appearance- Trial	8.00	\$1,600.00
07/19/16	NGL	Trial Prep Prepare Andrew Adams cross, Gerving direct, augment closing	5.30	\$1,060.00
07/20/16	NGL	Court Appearance- Jury Trial Trial Prep	8.00	\$1,600.00
07/20/16	NGL	Draft proposed jury verdict forms Draft final closing argument	5.50	\$1,100.00
07/20/16	NGL	Trial strategy discussions with Client	1.20	\$240.00
07/21/16	NGL	Court Appearance- Jury Trial Trial prep	8.00	\$1,600.00
07/21/16	NGL	Revise closing argument to reflect final jury instructions, verdict forms	1.50	\$300.00
07/22/16	NGL	Prepare case file for post trial motions	1.30	\$260.00
07/22/16	NGL	Court Appearance- Judge's Conference in Chambers Re: jury questions	1.00	\$200.00
07/22/16	NGL	Court Appearance- Jury verdict Jury discussions of case	1.50	\$300.00
07/27/16	NGL	Review email from and Prepare email to Andrew Re: documentation for fee Motion	0.50	\$100.00

07/27/16	NGL	Memo to legal secretary Re: documentation for proposed judgment	0.50	\$100.00
		Hours:	171.60	
		Total fees:		\$34,625.00

Expenses:

06/30/14	EXP	Humboldt County Superior Court		\$26.00
01/22/15	EXP	City of Eureka- Witness Fees		\$150.00
01/22/15	EXP	Humboldt County Superior Court		\$7.50
01/27/15	EXP	Humboldt County Recorder		\$50.00
02/23/15	EXP	Humboldt Investigations investigation		\$195.00
09/02/15	EXP	Process Service		\$50.00
09/02/15	EXP	Mileage		\$2.00
		Total expenses:		\$480.50

Payments & Adjustments:

07/15/14	Check No. 3336097	\$1,360.00 CR
10/14/14	Check No. 3924	\$2,000.00 CR
11/13/14	Check No. 107	\$2,000.00 CR
12/24/14	Check No.	\$2,746.19 CR
02/19/15	Check No. 109	\$535.00 CR
03/30/15	Check No. 110	\$4,570.00 CR
06/05/15	Check No. 111	\$2,476.59 CR
07/09/15	Check No. 112	\$800.00 CR

08/12/15	Check No. 113	\$600.00 CR
08/12/15	Remove late fees	\$9.56 CR
01/04/16	Check No. 114	\$2,054.21 CR
03/01/16	Check No. 115	\$270.21 CR
03/01/16	Remove late fees	\$34.26 CR
07/14/16	Check No. 116	\$1,044.67 CR
Total payments & adjustments:		\$20,500.69 CR

Billing Summary

Previous balance	\$0.00
Payments & adjustments	20,500.69 CR
Current fees & expenses	35,105.50
Total now due	\$14,604.81

PROOF OF SERVICE
F.R.C.P. 5 C.C.P. 1013a (2) Rules of Court, Rule 2060

I am a resident of, or employed in the County of Los Angeles, State of California. I am over the age of 18 years old and not a party to the within action. My business address is 1501 S Barrington Avenue, Suite 100, Los Angeles, CA 90049.

On August 10, 2016 I served the following listed document(s), by method indicated below, on the parties in this action: **Prior Receiver Mark S. Adams Motion for Interim Fee Order; Memorandum of Points and Authorities; Declaration of Mark Adams; (Proposed) Order**

*****SEE ATTACHED SERVICE LIST*****

☒ **BY U.S. MAIL**

By placing ☐ the original ☒ a true copy, placed enclosed in a sealed envelope(s), with postage prepaid, addressed as per the attached service list, for collection and mailing at the City of Burbank in Burbank, California following ordinary business practices. I am readily familiar with the firm's practice for collection and processing of the document for mailing. Under that practice, the document is deposited with the United States Postal Service on the same day as the ordinary course of business. I am aware that upon initiation of any party served, service is presumed valid if the postal cancellation date or postage meter date on the envelope is more than one day after date of deposit for mailing contained in the affidavit.

☐ **BY OVERNIGHT DELIVERY**

By delivering the document(s) listed above in a sealed envelope(s) or packing(s) designated by the express service carrier, with delivery fees paid or provided for, addressed as per the attached service list, to a facility regularly maintained by the express service carrier or to an authorized courier or driver authorized by the express service carrier to receive documents.

☐ **BY PERSONAL SERVICE**

☐ By personally delivering the document(s) listed above to the offices at the addressee(s) as shown on the attached service list.

☐ By placing the document(s) listed above in a sealed envelope(s) and initiating a registered process server to personally deliver the envelope(s) to the offices at the addressee(s) set forth on the attached service list. The signed proof of service by the registered process server is attached.

☐ **BY ELECTRONIC SERVICE**

(in electronic filing service provider)

By electronically transmitting the document(s) listed above to LexisNexis Fil and Serve, an electronic filing service provider, at www.flcourtservices.com pursuant to the Court's Order mandating electronic service. See California E-File 2013, 2014, 2015. The transmission was reported as complete and without error.

☐ **BY ELECTRONIC SERVICE**

(in individual person)

By electronically transmitting the document(s) listed above to the email addresses of the person(s) set forth on the attached service list. The transmission was reported as complete and without error. See Rules of Court rule 2060.

☐ **BY FACSIMILE**

By transmitting the document(s) listed above from Mark Adams, Esq., facsimile (405) 471-0181 to the facsimile receiving telephone number(s) set forth on the attached service list. Service by facsimile transmission was made pursuant to agreement of the parties, confirmed in writing.

☒ **STATE**

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☐ **FEDERAL**

I declare under penalty of perjury under the laws of the United States that I am employed in the office of a member in the bar of this court of whose district the service is made.

Tyler Huxtable
Type or Print Name


Signature

PROOF OF SERVICE

1
2 **SERVICE LIST**

3 *City of Eureka v. Floyd Squares, et al (Case No. DR110040)*
4

5 **Attorneys for Petitioner, City of Eureka**

6 Dean J. Pucci, Esq.
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10 **Attorney for Respondents**

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12 FLOYD LAW FIRM
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14 Eureka, CA 95501
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Email: floydlaw@suddenlinkmail.com

15 **Receiver**

16 Jeffrey Smith
17 PO Box 6218
18 Eureka, CA 95502
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28 **PROOF OF SERVICE**

MARK S. ADAMS, SB#683100
ANDREW F. ADAMS, SB#275109
California Receivership Group, PBC
2716 Ocean Park Blvd., Suite 3010
Santa Monica, California 90405
Tel. (310) 471-8181
Fax (310) 471-8180
madams@calreceivers.com
Court-Appointed Receiver

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF HUMBOLDT

CITY OF EUREKA, a municipal
corporation, ("the City") and the PEOPLE
OF THE STATE OF CALIFORNIA, ("the
People") by and through Jones & Mayer,
Special Counsel of the City of Eureka,

Petitioner,

vs.

FLOYD SQUIRES; FLOYD E. SQUIRES;
FLOYD E. SQUIRES III; BETTY J.
SQUIRES; FB SQUIRES FAMILY
TRUST; BETTY J'S BUILDING, INC; and
DOES ONE through SIXTY,

Respondents.

Case No.: DR110040

(PROPOSED) ORDER

Date: September 9, 2016
Time: 8:00 a.m.
Dept.: 4

The Court, having considered the Receiver Mark Adams ("Adams") Motion for Interim Fees and Costs, the previous receiver's reports and accountings, the documents and testimony in this case, and good cause appearing therefor,

NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

1. Adams's Motion for Interim Fees and Costs is hereby approved, and the actions described therein ratified,

-1-
(PROPOSED) ORDER

2. Respondents Floyd Squires, Floyd E. Squires, Floyd E. Squires III, Betty J. Squires, FB Squires Family Trust, and Betty J's Building, Inc. are hereby ordered to immediately pay the Receiver the amount of \$223,715.39.

3. The total amount due to Adams of \$223,715.39 is a joint and several personal obligation of the named Respondents in this matter. Adams is authorized to collect the full amount of this judgment from Floyd Squires, Floyd E. Squires, Floyd E. Squires III, Betty J. Squires, FB Squires Family Trust, and Betty J's Building, Inc.

4. As the former appointed Receiver in this matter, Adams is authorized to issue a Receiver's Certificate ("the Certificate") or increase the existing Certificate with first lien (super priority) status in an amount not to exceed the total of \$223,715.39 to recover the costs and fees. This Certificate is to be secured by a deed of trust on the properties listed in the appointment order dated March 10, 2011, appointment order dated October 24, 2011, and again listed below:

a) 609 Summer Street, Eureka, CA (APN: 001-042-012)

b) 119 W. 6th Street, Eureka, CA (APN: 001-042-13)

c) 202 3rd Street, Eureka, CA; 315 C. Street, Eureka, CA (APN: 001-066-001)

d) 216 3rd Street, Eureka, CA (APN: 001-066-022)

e) 205 4th Street, Eureka, CA; 317 C. Street, Eureka, CA; 325 C. Street, Eureka, CA (APN: 001-066-007)

f) 117-119 5th Street, Eureka, CA (APN: 001-071-004)

g) 211-219 5th Street, Eureka, CA (APN: 001-103-004)

h) 1637 3rd Street, Eureka, CA (APN: 002-063-005)

i) 2325 2nd Street, Eureka, CA (APN: 002-123-004)

j) 1410 Union Street, Eureka, CA (APN: 004-033-003)

k) 1233 A Street, Eureka, CA (APN: 004-112-008)

l) 241 Wabash Avenue, Eureka, CA (APN: 004-196-007)

m) 1803 C. Street, Eureka, CA (APN: 004-203-001)

n) 833 H Street, Eureka, CA (APN: 005-012-005)

- o) 705 15th Street, Eureka, CA (APN: 005-012-008)
- p) 1625 G Street, Eureka, CA; 1625 G Street, Eureka, CA (APN: 005-053-006)
- q) 1635 G Street, Eureka, CA (APN: 005-053-007)
- r) 1925 H Street, Eureka, CA (APN: 005-075-009)
- s) 1429 Sunny Avenue, Eureka, CA (APN: 006-191-015)
- t) 2245 Broadway, Eureka, CA (APN: 008-011-007)
- u) 2235 Broadway, Eureka, CA (APN: 008-001-010)
- v) 204 W. Hawthorne Street, Eureka, CA (APN: 009-122-005)
- w) 2941 California Street, Eureka, CA; 2969 California Street, Eureka, CA (APN: 010-061-010)
- x) 2927 California Street, Eureka, CA (APN: 010-061-011)
- y) 2535 I Street, Eureka, CA (APN: 011-153-005)
- z) 2445 Russ Street, Eureka, CA (APN: 013-171-010)

5. Adams is authorized to sign any Receivership Certificate and accompanying deed of trust with power of sale that he deems complies with the terms of this Order. The Certificate shall be executed in favor of any lender as may willing to finance such a Receiver's Certificate on such terms as are commercially reasonable and acceptable to Adams and as are subsequently reported to the Court.

6. The sums due under the Certificate shall be due and payable at such time as the Receiver and the lender shall agree and subsequently report to the Court but in no case later than the date on which the Court approves the replacement receiver's final accounting and is discharged

1 7 The Certificate and Deed of Trust shall be a lien with priority over any and all
2 existing liens or encumbrances (including the existing first trust deed on the property) other than
3 any lien recorded by a governmental entity for taxes on the property. The Certificate, the
4 accompanying Deed of Trust and this Order shall be recorded with the Office of the Humboldt
5 County Recorder.

11
12 IT IS SO ORDERED.

13
14 DATED: _____ 2016

15 Judge of the Superior Court